

Hearing Date: June 12, 2019 at 9:30 a.m. (Atlantic Standard Time)
Objection Deadline: May 28, 2019 at 4:00 p.m. (Atlantic Standard Time)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

(Jointly Administered)

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**NOTICE OF HEARING WITH RESPECT TO
MOTION FOR ENTRY OF AN ORDER (A) APPROVING AMENDED
OMNIBUS OBJECTION PROCEDURES, (B) WAIVING THE REQUIREMENT OF
BANKRUPTCY RULE 3007(e), (C) APPROVING ADDITIONAL FORMS OF NOTICE,
AND (D) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), and the Puerto Rico Electric Power Authority (“PREPA,” and together with the Commonwealth, HTA, and ERS, the “Debtors”), as Title III debtors, by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Debtors’ representative pursuant to Section 315(b) of the *Puerto Rico Oversight, Management,*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

and Economic Stability Act (“PROMESA”),² are filing the annexed *Motion For Entry Of An Order (A) Approving Amended Omnibus Objection Procedures, (B) Waiving the Requirement of Bankruptcy Rule 3007(e), (C) Approving Additional Forms of Notice, and (D) Granting Related Relief* (the “Motion”).³

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, must conform to the Federal Rules of Bankruptcy Procedure and the *Eighth Amended Notice, Case Management and Administrative Procedures* [ECF No. 4866] (the “Case Management Procedures”), and must be filed with the Court (a) by registered users of the Court’s case filing system, electronically in accordance with Rule 5 of the Local Rules for the District of Puerto Rico, and (b) by all other parties in interest, by submitting a hard copy via mail to the Clerk’s Office, United States District Court, 150 Carlos Chardón Avenue, Federal Building, Room 150, San Juan, PR 00918-1767 or by hand delivery to the Clerk’s Office, United States District Court, 150 Carlos Chardón Avenue, Room 150, San Juan, PR 00918, and serving it in hard copy or on a CD-ROM, in text-searchable portable document format (PDF), on (a) counsel for the Oversight Board, Proskauer Rose LLP, Eleven Times Square, New York, New York 10036-8299 (Attn: Martin J. Bienenstock, Esq., Brian Rosen, Esq., Paul V. Possinger, Esq., and Ehud Barak, Esq.), and O’Neill & Borges LLC, 250 Muñoz Rivera Ave., Suite 800, San Juan, PR 00918-1813 (Attn: Hermann D. Bauer, Esq.); (b) counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority, O’Melveny & Myers LLP, 7 Times Square, New York, New York 10036 (Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., and Peter Friedman, Esq.) and Marini Pietrantoni Muñiz LLC, MCS Plaza, Suite 500, 255 Ponce de León

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

³ For purposes of this Motion only, and because COFINA has already reconciled substantially all of its proofs of claim, COFINA is not included among the Debtors seeking relief herein.

Ave., San Juan, PR 00917 (Attn: Luis C. Marini-Biaggi, Esq.); and (c) the Office of the United States Trustee for Region 21, Edificio Ochoa, 500 Tanca Street, Suite 301, San Juan, PR 00901-1922, so as to be received no later than **May 28, 2019 at 4:00 p.m. (Atlantic Standard Time)**.

PLEASE TAKE FURTHER NOTICE that a hearing will be held before the Honorable Laura Taylor Swain, United States District Court Judge, in Room 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Avenue, Federal Building, Room 150, San Juan, Puerto Rico 00918-1767 (the “Court”), on **June 12, 2019 at 9:30 a.m. (Atlantic Standard Time)**, or as soon thereafter as counsel may be heard, to consider the relief sought by the Debtors in the Motion.

PLEASE TAKE FURTHER NOTICE that the relief requested in the Motion may be granted without a hearing if no objection is timely filed, served, and received in accordance with the Case Management Procedures.

PLEASE TAKE FURTHER NOTICE that copies of the Motion, including all exhibits, and all documents filed in these Title III cases are available (a) free of charge by visiting <https://cases.primeclerk.com/puertorico> or by calling +1 (844) 822-9231, and (b) on the Court’s website at <http://www.prd.uscourts.gov>, subject to the procedures and fees set forth therein.

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Dated: May 21, 2019
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.⁴

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION FOR ENTRY OF AN ORDER (A) APPROVING
AMENDED OMNIBUS OBJECTION PROCEDURES, (B) WAIVING THE
REQUIREMENT OF BANKRUPTCY RULE 3007(e), (C) APPROVING
ADDITIONAL FORMS OF NOTICE, AND (D) GRANTING RELATED RELIEF**

To the Honorable United States District Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Puerto Rico Electric Power Authority (“PREPA,” and together with the Commonwealth, ERS, and HTA, the “Debtors,” and each individually, a “Debtor”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Debtors’ representative pursuant to Section 315(b)

⁴ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),⁵ respectfully submit this motion (the “Motion”),⁶ pursuant to section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”), made applicable to these cases pursuant to PROMESA section 301(a), Rules 2002(m) and 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), made applicable to these cases pursuant to PROMESA section 310, and Rule 1007-1(f) of the Puerto Rico Local Bankruptcy Rules (the “Local Bankruptcy Rules”), for entry of an order, substantially in the form annexed hereto as Exhibit A (the “Proposed Order”), approving amended omnibus objection procedures and additional forms of notice, waiving the requirement of Bankruptcy Rule 3007(e), and granting related relief, and in support of this Motion, the Debtors respectfully state as follows:

JURISDICTION

1. The United States District Court for the District of Puerto Rico has subject matter jurisdiction over this Motion pursuant to PROMESA section 306(a).
2. Venue is proper in this district pursuant to PROMESA section 307(a).
3. The statutory predicates for the relief sought herein are Bankruptcy Code section 105(a), Bankruptcy Rules 2002(m) and 3007, made applicable to these cases by PROMESA sections 301(a) and 310, respectively, and Local Bankruptcy Rule 1007-1(f).

CLAIMS RECONCILIATION PROCESS

4. For each of the Debtors, the Oversight Board, at the request of the Governor, issued a restructuring certification pursuant to PROMESA sections 104(j) and 206 and filed a voluntary petition for relief, pursuant to PROMESA section 304(a), commencing a case under

⁵ PROMESA is codified at 48 U.S.C. §§ 2101-2241.

⁶ For purposes of this Motion only, and because COFINA has already reconciled substantially all of its proofs of claim, COFINA is not included among the Debtors seeking relief herein.

Title III thereof (collectively, the “Title III Cases”). On June 1, 2017, the Court entered an order granting the joint administration of the Title III Cases, for procedural purposes only.

A. The Bar Date Order, Proofs of Claim Filed, and Omnibus Objections Procedures

5. On January 16, 2018, the Debtors filed their *Motion for Order (A) Establishing Deadlines and Procedures for Filing Proofs of Claim and (B) Approving Form and Manner of Notice Thereof* [ECF No. 2255]⁷ (the “Bar Date Motion”). By the *Order (A) Establishing Deadlines and Procedures for Filing Proofs of Claim and (B) Approving Form and Manner of Notice Thereof* [ECF No. 2521] (the “Initial Bar Date Order”), the Court granted the relief requested in the Bar Date Motion and established deadlines and procedures for filing proofs of claim in the Title III Cases. Upon the informative motion of certain creditors, and the support of the Debtors, the Court subsequently entered the *Order (A) Extending Deadlines for Filing Proofs of Claim and (B) Approving Form and Manner of Notice Thereof* [ECF No. 3160] (together with the Initial Bar Date Order, the “Bar Date Orders”) extending these deadlines to June 29, 2018 at 4:00 pm (Atlantic Time).

6. To date, over 165,000 proofs of claim have been filed (collectively, the “Claims” and each, a “Claim”) against the Debtors and logged by Prime Clerk, LLC. The Claims total approximately \$43.5 trillion in asserted claims against the Debtors.

7. To expedite and ultimately complete the claims reconciliation process in a timely, efficient, and cost-effective manner, on October 16, 2018, the Debtors filed a motion seeking approval of certain limited omnibus objection procedures. *See Motion for Entry of an Order (A) Approving Limited Omnibus Objection Procedures, (B) Waiving the Requirement of Bankruptcy Rule 3007(e)(6), and (C) Granting Related Relief* [ECF No. 4052]. In response to informal

⁷ All ECF citations refer to documents filed in Bankruptcy Case No. 17 BK 3283-LTS.

comments received, the Debtors, on October 31, 2018, filed a revised proposed order approving limited omnibus objection procedures, which order was entered by the Court on November 14, 2018. *See Order (A) Approving Limited Omnibus Objection Procedures, (B) Waiving the Requirement of Bankruptcy Rule 3007(e)(6), (C) Granting Related Relief and (D) Directing the Debtors to File on Presentment the Form of Notice* [ECF No. 4230] (the “Initial Omnibus Procedures Order”). On November 29, 2018, the Court approved the English and Spanish versions of the forms of notice for omnibus objections to be filed in accordance with the Initial Omnibus Procedures Order. *See Order Approving the English and Spanish Versions of the Form of Notice for Omnibus Objections* [ECF No. 4381] (the “Initial Notice Order”).

8. Pursuant to the Initial Omnibus Procedures Order, the Debtors may, *inter alia*, file omnibus objections to claims on the grounds expressly set forth in Bankruptcy Rule 3007(d)(1)-(7). Each omnibus objection filed pursuant to the Initial Omnibus Procedures Order may object to as many as five hundred claims. To date, nineteen omnibus objections have been filed by COFINA in accordance with the Initial Omnibus Procedures Order and Initial Notice Order. By orders, dated January 31, 2019, February 7, 2019, March 26, 2019, March 27, 2019, and April 2, 2019, and following hearings on January 30, 2019, and March 13, 2019, the Court has granted omnibus objections and individual objections related to over 3,100 proofs of claim filed against COFINA, resulting in these proofs of claim being disallowed or reclassified to be asserted against another of the Debtors. Permitting the Debtors to file non-substantive objections in accordance with the Initial Omnibus Procedures Order has reduced the costs, resources, and delay that would be entailed by preparing and filing hundreds of individualized objections based on the same or similar underlying grounds.

B. Amended Omnibus Objection Procedures

9. During their ongoing review of the Claims, the Debtors have identified substantive issues common to multiple Claims. To minimize the cost, confusion, and delay otherwise attendant to preparing and filing individual objections on a Claim-by-Claim basis, the Debtors seek approval of the amended omnibus objection procedures attached as **Exhibit 1** to **Exhibit A** hereto (the “Amended Omnibus Procedures”), which would permit them to object to Claims on the grounds set forth in Bankruptcy Rule 3007(d)(1)-(7), and on the additional, substantive grounds (collectively, the “Additional Grounds”) that such Claims, in whole or in part:

- a. are inconsistent with the Debtors’ books and records;
- b. fail to specify the asserted Claim amount or only list the Claim amount as “unliquidated”, “undetermined” or “unknown”;
- c. seek recovery of amounts for which the Debtors are not liable;
- d. are incorrectly or improperly classified; or
- e. are filed against non-Debtors.

Each Omnibus Objection filed pursuant to an Additional Ground will, in the Objection and/or its attachments, state the factual and legal bases on which the Objection is asserted, as further detailed in the Amended Omnibus Procedures. Each Omnibus Objection will also denote whether it is based on a substantive or a non-substantive basis or bases. A redline showing the difference between the Initial Omnibus Procedures and the proposed Amended Omnibus Procedures is attached hereto as **Exhibit B**.

10. The Amended Omnibus Procedures retain the procedural safeguards outlined in the Initial Omnibus Procedures Order. Specifically, as described in the Amended Omnibus

Procedures, each omnibus objection, in compliance with the requirements of Bankruptcy Rules 3007(e)(1)-(2) and 3007(e)(4)-(5), will:

- a. state in a conspicuous place and manner that claimants receiving the objection should locate their names and claims in the objection;
- b. list claimants alphabetically, provide a cross-reference to claim numbers, and, if appropriate, list claimants by category of claims;
- d. state in the title of the objection the identity of the objector and the grounds for the objections, including whether it is a non-substantive or substantive objection; and
- e. be numbered consecutively with other omnibus objections filed by the same objector.

11. Each omnibus objection will be accompanied by a claims exhibit (each a "Claims Exhibit") that will identify the Claims to which an objection is being interposed. Only a single Claims Exhibit will accompany each omnibus objection, and each Claims Exhibit will include only Claims to which there is a common basis or bases for objection. Each Claims Exhibit will further provide a reason for objecting to each Claim. To the extent an omnibus objection seeks to reduce the amount of a claim or to liquidate an otherwise unliquidated claim, the Claims Exhibit shall identify the proposed claim amount. The Debtors respectfully request that, to allow for more efficient preparation of the Claims Exhibit, the Court waive the requirements of Bankruptcy Rule 3007(e)(3) that an omnibus objection must provide a cross-reference to the pages in the omnibus objection pertinent to the stated grounds for each Claim. Requiring a Claims Exhibit to be filed in this manner provides similar protection to Bankruptcy Rule 3007(e)(3), and thus eliminates the need to cross-reference the description of the basis or bases for each Claim set forth within the body of the omnibus objection. However, any failure to identify additional bases for objecting to a particular Claim will not constitute a waiver of the Debtors' right to subsequently object on these, or any other, additional grounds.

12. Each omnibus objection will also be accompanied by a proposed order which shall provide a clear reference to the Claims Exhibit accompanying the objection. To the extent a Claims Exhibit is revised and resubmitted to the Court, the Debtors will provide the Court with revised proposed orders that attach the revised Claims Exhibits as attachments to the revised proposed order.

13. Pursuant to the Amended Omnibus Procedures, information regarding creditors' rights to file a response, and procedure and appropriate time for doing so (in compliance with Local Bankruptcy Rule 3007-1), shall be included in the notice accompanying each omnibus objection, so as to protect the due process rights of creditors. The Court, as noted above, previously approved the forms of notice for objections filed in accordance with the Initial Omnibus Procedures Order. The Amended Omnibus Procedures further provide that the Court shall approve all forms of notice, which shall include the notice required pursuant to Local Bankruptcy Rule 3007-1. Accordingly, the Debtors request that the Court enter an order approving the additional forms of notice, attached as Exhibits 2-6 to Exhibit A, to accompany omnibus objections to be filed on the basis of one or more Additional Grounds.

14. The Amended Omnibus Procedures also incorporate additional procedural safeguards which will further streamline and clarify the objections process for claimants and for the Court. The Amended Omnibus Procedures require that all omnibus objections, as well as all associated briefing, must be filed only on the docket of *In re Commonwealth of Puerto Rico*, Case No. 17 BK 3283-LTS, and served upon the individual creditors, the U.S. Trustee, and the Master Service List. The Amended Omnibus Procedures also provide additional clarity on the manner in which any responses to an omnibus objection must be filed and served upon the Oversight Board and the Creditors' Committee, consistent with the requirements of the Court's

Order Further Amending Case Management Procedures, ECF No. 4866. Because the Amended Omnibus Procedures permit omnibus objections to be filed on substantive grounds, the prohibition on discovery in relation to any omnibus objection has been deleted. Moreover, pursuant to the Amended Omnibus Procedures, all omnibus objections must be scheduled for a hearing in connection with an omnibus hearing date. To permit more efficient resolution of the outstanding claims, the Amended Omnibus Procedures also enlarge the number of Claims on a single omnibus objection from 500 to 1,000. The Debtors believe that limiting omnibus objections to five-hundred claims, as specified by the Initial Omnibus Procedures, would result in repetitive and costly omnibus objections that could confuse creditors, complicate the Court's docket, and delay the resolution of the claims reconciliation process, and thus request that this requirement of Bankruptcy Rule 3007(e)(3) continue to be waived.

15. The Amended Omnibus Procedures also allow for creditors to file a response to an omnibus objection, for the Debtors to file a reply to any creditors' response, and for the Court to resolve any such contested claims as a separate contested matter under Bankruptcy Rule 9014. Pursuant to the Amended Omnibus Procedures, in conjunction with any replies the Debtors file in support of an omnibus objection, the Debtors will file a chart detailing the status of each claim subject to that omnibus objection. To the extent the status of any claim changes, the Debtors will file an updated chart by 9:00am (AST) on the day before the omnibus hearing at which the omnibus objection will be heard.

16. Overall, the Amended Omnibus Procedures will allow the Debtors to complete the claims reconciliation process in a timely, efficient, and cost-effective manner by avoiding the costs, resources, and delay of preparing and filing thousands of individualized objections based on the same or similar underlying grounds.

BASIS FOR RELIEF

17. Section 502(a) of the Bankruptcy Code provides that “[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). Bankruptcy Rule 3001 states that “a proof of claim executed and filed in accordance with these rules shall constitute *prima facie* evidence of the validity and amount of the claim.” *See Fed. R. Bankr. P. 3001*. Under section 1111(a) of the Bankruptcy Code, scheduled claims are treated as proofs of claim. *See 11 U.S.C. § 1111(a)* (“A proof of claim . . . is deemed filed under section 501 of this title for any claim . . . that appears in the schedules . . . except a claim . . . that is scheduled as disputed, contingent or unliquidated.”). As such, the Debtors must review all Claims in these Title III Cases as part of the claims reconciliation process.

18. In addition to the grounds enumerated in Bankruptcy Rule 3007(d) for filing omnibus objections to claims, Bankruptcy Rule 3007(c) affords courts the discretion to authorize omnibus objections based upon grounds beyond those explicitly delineated by Bankruptcy Rule 3007(d). *See Fed. R. Bankr. P. 3007(c)* (“Unless otherwise ordered by the court or permitted by subdivision (d), objections to more than one Claim shall not be joined in a single objection.”). Section 105(a) of the Bankruptcy Code, made applicable pursuant to Section 301 of PROMESA, provides that a bankruptcy court may “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions [of the Bankruptcy Code].” 11 U.S.C. § 105. Under section 105(a) of the Bankruptcy Code, a bankruptcy court has the power to fashion any order or decree that is in the interest of preserving or protecting the value of a debtor’s assets. *See Canal Corp. v. Finnman (In re Johnson)*, 960 F.2d 396, 404 (4th Cir. 1992) (“[T]he allowance or disallowance of a claim in bankruptcy is a matter of federal law left to the bankruptcy court’s

exercise of its equitable powers.”); *Comm. of Equity Sec. Holders v. Lionel Corp. (In re Lionel Corp.)*, 722 F.2d 1063, 1069 (2d Cir. 1983) (“[A] bankruptcy judge must have substantial freedom to tailor his orders to meet differing circumstances.”).

19. Authorizing the Debtors to file omnibus objections consistent with the Amended Omnibus Procedures is an appropriate use of the Court’s power under Section 105(a) of the Bankruptcy Code and conforms to the spirit of Bankruptcy Rule 3007, the underlying goal of which is to balance the due process rights of creditors with the efficient administration of large bankruptcy cases. Each of the Additional Grounds are bases that have been permitted in prior bankruptcy proceedings. *See, e.g., In re Payless Shoes*, Case No. 17-bk-42267 (Bankr. E.D. Mo.), ECF No. 1831; *In re EnviroSolutions of New York, LLC*, 2011 WL 6779498 (Bank. S.D.N.Y. 2011); *In re The Budd Company, Inc.*, 540 B.R. 353 (Bankr. N.D. Ill. 2015); *In re LandAmerica Financial Group, Inc.*, 435 B.R. 343 (Bankr. E.D. Va. 2010).

20. The Amended Omnibus Procedures provide a cost-effective and efficient framework for the careful review, prosecution, and reconciliation of Claims by, among other things, (a) providing greater certainty in administering the objection process, and (b) reducing the cost, time, and delay of preparing numerous individualized Claims objections and the potential confusion of numerous individualized Claims objections filed on the Court’s docket. The Amended Omnibus Procedures respect creditors’ due process rights by implementing the safeguards set forth for omnibus objections already authorized under Bankruptcy Rule 3007(e), with the exception of certain provisions in Bankruptcy Rules 3007(e)(3) and 3007(e)(6).

21. Similarly, allowing the Debtors to object to claims on the Additional Grounds will promote the efficient and cost-effective administration of the Debtors’ Title III cases. Moreover, the claims reconciliation process will be well organized, and all parties in interest will benefit

from a streamlined process that will result in fewer pleadings, fewer hearings, and greater efficiency.

22. The Debtors believe that the relief requested herein appropriately balances judicial and administrative efficiency with due process rights. Accordingly, the Debtors respectfully request that the Court approve the relief requested herein.

NOTICE

23. The Debtors have provided notice of this motion to the Master Service List (as defined by the *Order Further Amending Case Management Procedures* [Case No. 17-3283, ECF No. 4866]), and this Motion is available on the Debtors' case website at <https://cases.primeclerk.com/puertorico>. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

NO PRIOR REQUEST

24. Except as provided in connection with the Initial Omnibus Procedures Order, no prior request for the relief sought in this motion has been made to this or any other court.

WHEREFORE the Debtors respectfully request entry of an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting such other relief as is just and proper.

Dated: May 21, 2019
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*)

Brian S. Rosen (*pro hac vice*)

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*Co-Attorneys for the Financial Oversight and
Management Board as representative for the
Debtors*

EXHIBIT A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

**ORDER (A) APPROVING AMENDED OMNIBUS OBJECTION PROCEDURES, (B)
WAIVING THE REQUIREMENT OF BANKRUPTCY RULE 3007(e), (C) APPROVING
ADDITIONAL FORMS OF NOTICE, AND (D) GRANTING RELATED RELIEF**

Upon the *Motion For Entry Of An Order (A) Approving Amended Omnibus Objection Procedures, (B) Waiving the Requirement of Bankruptcy Rule 3007(e), (C) Approving Additional Form of Notice, and (D) Granting Related Relief*, dated May 21, 2019 (the “Motion”),² of the Debtors for entry of an order (this “Order”) approving amended omnibus objection procedures, waiving certain requirements of Bankruptcy Rule 3007(e), and approving additional forms of notice, as more fully described in the Motion; and this Court having jurisdiction over this matter pursuant to PROMESA section 306(a); and it appearing that venue is proper pursuant to PROMESA section 307(a); and the Court having found that the relief requested in the Debtors’

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Motion is in the best interests of the Debtors, their creditors, and other parties in interest; and the Court having found that, based upon the relief requested by the Debtors' Motion, no other or further notice is required; and the Court having determined that the legal and factual bases set forth in the Debtors' Motion establish just cause for the relief granted herein; and any objections to the relief requested herein having been resolved as set forth herein, or withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted to the extent set forth herein and in the Amended Objection Procedures attached hereto as Exhibit 1.
2. Notwithstanding anything to the contrary in PROMESA, the Bankruptcy Code, the Bankruptcy Rules, or the Local Bankruptcy Rules, and pursuant to Bankruptcy Rule 3007(c), the Debtors may file Omnibus Objections that include objections to claims on any basis provided for in Bankruptcy Rule 3007(d)(1)-(7), as well as on any of the following grounds (the "Additional Grounds"):
 - a. Claims are inconsistent with the Debtors' books and records;
 - b. Claims fail to specify the asserted amount for each Claim, or for each Claim only list the amount as "unliquidated";
 - c. Claims seek recovery of amounts for which the Debtors are not liable;
 - d. Claims are incorrectly or improperly classified; or
 - e. Claims are filed against non-Debtors.
3. Notwithstanding anything to the contrary in the Bankruptcy Code, the Bankruptcy Rules, or the Local Bankruptcy Rules, the Debtors may object to as many as one thousand (1000) claims in a single Omnibus Objection on any basis provided for in Bankruptcy Rule 3007(d)(1)-(7) or on any of the Additional Grounds.

4. Notwithstanding anything to the contrary in the Bankruptcy Code, the Bankruptcy Rules, or the Local Bankruptcy Rules, to the extent Bankruptcy Rule 3007(e)(3) requires an omnibus objection to cross-reference the description of the basis or bases for each claim set forth within the body of the omnibus objection, such requirement is waived.

5. The Debtors may file and prosecute any Omnibus Objection in accordance with the Amended Objection Procedures, which are approved, and in accordance with the other procedural safeguards set forth in Bankruptcy Rule 3007(e), with the exception of Bankruptcy Rules 3007(e)(3) and 3007(e)(6), as described in the immediately preceding paragraphs.

6. Nothing in this Order or in the Motion is, or shall be deemed to constitute, any admission as to the validity, nature, amount, or priority of any claim asserted against the Debtors in these PROMESA cases, or a waiver of any right of the Debtors or any other party in interest in these cases to dispute the validity, nature, amount, or priority of, or otherwise object, either in the same or subsequent objections, on any grounds to any such claims.

7. The Debtors' proposed forms of notice, attached hereto as Exhibits 2-6, to be filed and served in connection with omnibus objections filed on the basis of the Additional Grounds set forth above, is approved.

8. The Debtors are authorized to take any and all actions reasonably necessary or appropriate to effectuate the relief granted pursuant to this Order in accordance with the Motion.

9. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2019

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT 1

Amended Omnibus Objection Procedures

AMENDED OMNIBUS OBJECTION PROCEDURES

1. **Grounds for Omnibus Objections.** The Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Puerto Rico Electric Power Authority (“PREPA,” and together with the Commonwealth, COFINA, ERS, and HTA, the “Debtors,” and each individually, a “Debtor”),¹ may file omnibus objections (each an “Omnibus Objection”) to proofs of claim filed against one or more Debtors (each a “Claim,” and collectively the “Claims”), on the grounds expressly set forth in Rule 3007(d)(1)-(7) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), as well as on the following additional grounds (the “Additional Grounds”):

- a. Claims are inconsistent with the Debtors’ books and records, and Omnibus Objections filed on this Additional Ground shall include the amount, if any, of each Claim as reflected in the applicable Debtor’s books and records;
- b. Claims fail to specify the asserted amount for each Claim, or for each Claim only list the amount as “unliquidated,” “undetermined,” or “unknown,” and which Debtors contend should be liquidated at a particular amount, and Omnibus Objections filed on this Additional Ground shall identify the claim amount, if any, that the Debtor believes in good faith should be allowed;
- c. Claims seek recovery of amounts for which the Debtors are not liable, and Omnibus Objections filed on this Additional Ground shall identify the legal basis for the contention that the Debtor is not liable for the Claim;
- d. Claims are incorrectly and/or improperly classified; or
- e. Claims are filed against non-Debtors.

2. **Form of Omnibus Objection.** Each Omnibus Objection will be numbered consecutively, regardless of basis, and will be filed and served in both Spanish and English. Each Omnibus Objection will denote whether it is based on a substantive or non-substantive basis or bases.

3. **Claims Exhibits.** An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto (each a “Claims Exhibit”). Each Claims Exhibit will include only the Claims to which there is a common basis or bases for the Omnibus Objection. Each Claims Exhibit will include, without limitation, the following information, alphabetized by claimant:

¹ For purposes of this Motion only, and because COFINA has already reconciled substantially all of their proofs of claim, COFINA is not included among the Debtors.

- a. the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;
- b. the asserted amount of the Claim(s);
- c. the grounds for the Omnibus Objection; and
- d. other information, as applicable, including: (i) the proposed classification of Claims the Debtors seek to reclassify; (ii) the proposed Claim amount of Claims the Debtors seek to reduce; or (iii) the surviving Claims, if any, of groups of Claims the Debtors seek to expunge.

To the extent an Omnibus Objection seeks to reduce a claim or to liquidate an otherwise unliquidated claim, the claims exhibit shall include the proposed adjusted claim amount. Each omnibus objection will also be accompanied by a proposed order which shall provide a clear reference to the Claims Exhibit accompanying the objection. To the extent a Claims Exhibit is revised and resubmitted to the Court, the Debtors will provide the Court with revised proposed orders that attach the revised Claims Exhibits as attachments to the revised proposed order.

4. Notice and Service. Each Omnibus Objection will be filed with the Court on the docket of *In re Commonwealth of Puerto Rico*, Case No. 17 BK 3283-LTS, and served upon (a) any individual creditors subject to such Omnibus Objection, (b) the U.S. Trustee, and (c) the Master Service List (as defined by the *Order Further Amending Case Management Procedures* [Case No. 17-3283, ECF No. 4806]), which is available on the Debtors' case website at <https://cases.primeclerk.com/puertorico>. The form of notice to accompany each Omnibus Objection shall be approved by the Court.

5. Hearing. Each Omnibus Objection shall be set for a hearing at the next omnibus hearing set by the Court, but in no event less than forty-five (45) days after service of the Omnibus Objection (the "Hearing"). In the Debtors' sole discretion, and, upon three (3) business days' prior notice to an individual creditor subject to an Omnibus Objection, the Debtors may adjourn the Hearing on the Omnibus Objection to a subsequent hearing date without further order of the Court. For claims subject to an Omnibus Objection and with respect to which no response is filed in accordance with the proposed response procedures (a "Response"), the Court may grant the Omnibus Objection with respect to those claims without further notice or hearing. For claims subject to an Omnibus Objection for which a Response is filed in accordance with the proposed response procedures, and for which the issues raised in the Response are resolved prior to the Hearing, the Debtors may request at the Hearing that the Court enter an order granting the Omnibus Objection with respect to such claim(s). If such claim(s) cannot be resolved and a hearing is determined to be necessary, the Debtors shall file with the Court and serve on the affected claimant(s) a notice of the hearing, to the extent the Debtors did not file a notice of hearing previously.

6. Contested Matter. Each claim subject to an Omnibus Objection, along with any Response thereto, shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court with respect to an Omnibus Objection will be deemed a separate order with respect to such claim. The Debtors may, in their discretion and in accordance with other orders of this Court and the provisions of the Bankruptcy Code and the

Bankruptcy Rules, settle the priority, amount, and validity of such contested claims without any further action, order, or approval of the Court. However, at least ten (10) business days prior to settling any claim, the Debtors shall contact counsel for the Creditors' Committee (in the manner and as defined by the *Order Further Amending Case Management Procedures* [Case No. 17-3283, ECF No. 4806]), which is available on the Debtors' case website at <https://cases.primeclerk.com/puertorico>, to advise them of the Debtors' intent to settle the claim ("Claim Settlement Notice"). The Claim Settlement Notice shall include (i) the claim number, (ii) the amount of the claim, (iii) a brief description of the intended settlement of the claim. If the Creditors' Committee does not inform Debtors of any objections to the Claim Settlement Notice within five (5) business days of service, or if any such objections are resolved by negotiations between the Debtors and the Creditors' Committee, then the Debtors may proceed in accordance with other orders of this Court and the provisions of the Bankruptcy Code and the Bankruptcy Rules, to settle the priority, amount, and validity of the contested claims as described in its Claim Settlement Notice, as modified by the parties' negotiations.

RESPONSES TO OMNIBUS OBJECTIONS

7. **Parties Required to File a Response.** Any party who disputes an Omnibus Objection is required to file a Response in accordance with the procedures set forth herein. If a party whose claim is subject to an Omnibus Objection does not file and serve a Response in compliance with the procedures below, the Court may grant the Omnibus Objection with respect to such claim without further notice to the claimant.

8. **Response Contents.** Each Response must contain the following (at a minimum):

- a. a caption stating the name of the Court, the name of the Debtors, the case number, the title of the Omnibus Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Prime Clerk website, <https://cases.primeclerk.com/puertorico>;
- b. a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to such claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection;
- c. a copy of any other documentation or other evidence of the claim, to the extent not already included with the Proof of Claim, upon which the claimant will rely in opposing the Omnibus Objection; provided, however, that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; provided, further, that the claimant shall disclose to the Debtors all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints; and
- d. the following contact information for the responding party:

- (i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the attorneys for the Debtors should serve a reply to the Response, if any; or
- (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the claimant's behalf.

9. Filing and Service of the Response. A Response will be deemed timely only if it is filed with the Court and served by 4:00 pm (Atlantic Time) on the deadline for filing a Response set forth in the notice accompanying the Omnibus Objection (the "Response Deadline"), which in no event shall be less than thirty (30) calendar days from the date the Omnibus Objection is served (or an additional three (3) days pursuant to Bankruptcy Rule 9006(f) if service was by mail). Each Response should be filed electronically with the Court on the docket of *In re Commonwealth of Puerto Rico*, Case No. 17 BK 3283-LTS. A Response should be filed electronically in searchable portable document format by a registered user of the Court's case filing system, except if a party is not an attorney who is a registered user of the Court's case filing system, the Response may be filed and served by mailing it to the Court's Clerk's office, the Oversight Board, and the Creditors' Committee at the following addresses:

Clerk's Office
United States District Court
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Counsel for the Oversight Board
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036-8299
Attn: Martin J. Bienenstock
Brian S. Rosen

Counsel for the Creditors' Committee
Paul Hastings LLP
200 Park Avenue
New York, New York 10166
Attn: Luc. A. Despins
G. Alexander Bongartz

Any Response must be mailed so as to be received by the Clerk's Office, the Oversight Board, and the Creditors' Committee no later than 4:00 pm (Atlantic Standard Time) on the Response Deadline, unless otherwise extended by the Debtors, in writing, or upon a written request to the Court and order of the Court extending the deadline. If a party is unable to file and serve a Response online or by mail as specified above, a Response may be filed in person at the

following address by no later than 4:00 pm (Atlantic Standard Time) on the Response Deadline, unless otherwise extended by the Debtors, in writing, or upon a written request to the Court and order of the Court extending the deadline:

Clerk's Office
United States District Court
#150 Chardon Avenue
Federal Building
San Juan, Puerto Rico 00918

Each Response must include a certificate of service explaining how service was accomplished.

10. Failure to Respond. A Response that is not filed and served by the Response Deadline, or such other date as agreed with the Debtors, in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent reaching an agreement with the Debtors resolving the Omnibus Objection to a Claim, failure to timely file and serve a Response as set forth herein may result in the Court granting the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

11. Reply to a Response. The Debtors shall be permitted to file a reply to any Response on the docket of *In re Commonwealth of Puerto Rico*, Case No. 17 BK 3283-LTS no later than seven (7) calendar days before the Hearing with respect to the relevant Omnibus Objection. Contemporaneously with their reply in support of any Omnibus Objection, the Debtors shall file a revised proposed order, which shall attach a revised Claims Exhibit detailing the status of each claim that is subject to such omnibus objection, including docket references for withdrawals of responses. To the extent the status of any claim changes, revised proposed orders, which shall attach revised Claims Exhibits, must be filed by 9:00am (AST) on the day before the omnibus hearing.

MISCELLANEOUS

12. Additional Information. Copies of these procedures, the Order, or any other pleadings filed in the Debtors' Title III cases are available free online at <https://cases.primeclerk.com/puertorico>.

13. Inquiries. Creditors should direct questions regarding the status of a particular Omnibus Objection to Prime Clerk at (844) 822-9231.

14. Reservation of Rights. NOTHING IN THESE PROCEDURES, ANY OMNIBUS OBJECTION, OR ANY OBJECTION NOTICE IS OR SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF THE DEBTORS OR ANY OTHER PARTY IN INTEREST IN THESE CASES TO DISPUTE ANY CLAIMS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY

CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE
NOTICE THEREOF AT SUCH TIME.

EXHIBIT 2

**English and Spanish Versions of the Form of Notice for Omnibus Objections based on the
Claim being Inconsistent with the Debtors' Books and Records**

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF [###] OMNIBUS OBJECTION (SUBSTANTIVE) OF [DEBTOR] TO
INCONSISTENT CLAIMS**

PLEASE CONFIRM WHETHER YOUR CLAIM IS LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION. THE OMNIBUS OBJECTION ONLY SEEKS TO ALTER YOUR RIGHTS IF YOUR CLAIM IS LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION. ANY CLAIM THAT IS DISALLOWED IN ITS ENTIRETY WILL BE TREATED AS THOUGH IT WERE NEVER FILED.

IF YOUR CLAIM IS LISTED ON EXHIBIT A, [DEBTOR] IS SEEKING TO DISALLOW YOUR CLAIM IN WHOLE OR IN PART BECAUSE IT IS INCONSISTENT WITH [DEBTOR'S] BOOKS AND RECORDS. EXHIBIT A IDENTIFIES THE CLAIM AMOUNT, IF ANY, AS REFLECTED IN [DEBTOR'S] BOOKS AND RECORDS.

YOU SHOULD READ THIS NOTICE AND THE OMNIBUS OBJECTION CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

PLEASE TAKE NOTICE THAT, on [DATE], the [Debtor], by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as [Debtor]’s representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),¹ filed the *[###] Omnibus Objection of [Debtor] (Substantive) to Inconsistent Claims* (the “Omnibus Objection”) with the United States District Court for the District of Puerto Rico (the “Court”),² a copy of which is attached to this notice.

¹ PROMESA is codified at 48 U.S.C. §§ 2101-2241.

² Capitalized terms used but not defined herein shall have the meanings set forth in the Omnibus Objection.

OVERVIEW

- PLEASE CHECK IF YOUR CLAIM(S) IS/ARE LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION.
- If your claim(s) is/are NOT listed on Exhibit A, your claim(s) will not be affected by the Omnibus Objection, and you DO NOT have to do anything.
- If your claim(s) is/are listed on Exhibit A to the Omnibus Objection, [Debtor] is seeking to disallow your claim(s) listed on Exhibit A because, as explained in the accompanying Omnibus Objection, the documentation you provided to support your Claim is inconsistent with [the Debtor's] books and records. The amount listed on Exhibit A is the claim amount, if any, that is reflected in [the Debtor's] books and records.
- Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>.
- If you have questions, please contact Prime Clerk at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OMNIBUS OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

IMPORTANT NOTICE PURSUANT TO LOCAL RULE 3007-1

Any party against whom this Omnibus Objection has been served, or any other party to the action who objects to the relief sought herein, shall serve and file a response to the Omnibus Objection with the clerk's office of the United States District Court for the District of Puerto Rico by **4:00 pm (Atlantic Standard Time)** on [Date] unless otherwise extended, in writing, by [Debtor]. If no response is filed within the time allowed herein, the Omnibus Objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the Court may schedule a hearing.

Critical Information for Claimants Choosing to File a Response

Who is Required to File a Response. Any party who disputes the Omnibus Objection is required to file a response in accordance with the procedures set forth herein. If a party whose claim is subject to the Omnibus Objection does not file and serve a response in compliance with the procedures herein, the Court may grant the Omnibus Objection with respect to such claim without further notice to the claimant.

Who is NOT Required to File a Response. If you do not oppose the disallowance in whole or in part of your claim(s) that are listed on Exhibit A to the Omnibus Objection, then you

do not need to file a written response to the Omnibus Objection and you do not need to appear at the hearing on the Omnibus Objection (described below). Additionally, the Omnibus Objection only applies to the claims listed on Exhibit A to the Omnibus Objection, a copy of which is available free online at <https://cases.primeclerk.com/puertorico>. No response is required if your claim is not listed on Exhibit A to the Omnibus Objection.

Deadline for Filing a Response. Your response will be deemed timely **only if** it is filed with the Court **and** served by **4:00 pm (Atlantic Standard Time)** on **[Date]**, unless otherwise extended, in writing, by [Debtor] or upon written request to the Court and order of the Court extending the deadline.

**The deadline for filing and serving a response is
4:00 pm (Atlantic Standard Time) on [Debtor].**

Hearing on the Omnibus Objection. If a response is properly filed and served in accordance with this notice, a hearing on the Omnibus Objection and the response will be held at **9:30 a.m. (Atlantic Standard Time) on [Date]**, before The Honorable Laura Taylor Swain at the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767. If you file a response to the Omnibus Objection, then you should plan to appear at the hearing on the Omnibus Objection. [Debtor], however, reserves the right, on three (3) business days' notice, to adjourn the hearing with respect to the Omnibus Objection and the response.

The Debtors may file a reply to your response or reply in oral argument at the hearing. The Debtors are permitted to file their reply no later than seven (7) calendar days before the hearing on the Omnibus Objection and the response.

THE COURT WILL ONLY CONSIDER YOUR RESPONSE IF YOUR RESPONSE IS FILED AND SERVED BY THE RESPONSE DEADLINE IN ACCORDANCE WITH THE INSTRUCTIONS SET FORTH IN THIS NOTICE.

What to File with a Response. Your response to the Omnibus Objection must contain the following information.

- (i) **Contact Information.** The response must include a **name, address, telephone number, and email address** of either (1) the responding claimant; (2) the claimant's attorney or designated representative to whom the attorneys for [Debtor] should serve a reply to the response, if any; or (3) the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the claimant's behalf.
- (ii) **Caption.** The response must contain a caption stating the name of the Court, the names of the Debtors, the case number, the title of the Omnibus Objection to which the response is directed, and the proof of claim number(s) related thereto from Prime Clerk (which are listed on Exhibit A to the Omnibus Objection and available

free online at <https://cases.primeclerk.com/puertorico>).

- (iii) **Reason(s) for Opposing the Omnibus Objection.** The response must contain a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection.
- (iv) **Supporting Documentation.** To the extent not already included with the proof of claim, the response should include a copy of any other documentation or other evidence of the claim, upon which the claimant will rely in opposing the Omnibus Objection; provided, however, that the claimant need not disclose confidential, proprietary, or otherwise protected information in the response; and provided, further, that the claimant shall disclose to [Debtor] all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints.

Where and How to File and Serve a Response. Every response should be filed electronically with the Court on the docket of *In re Commonwealth of Puerto Rico*, Case No. 17 BK 3283-LTS. There are two methods that you can use to file your response:

1. **Online.** Registered users of the Court's case filing system must file their response electronically in searchable portable document format.
2. **By Mail.** If you are not an attorney who is a registered user of the Court's case filing system, you may file and serve a response by mailing it to the Court's Clerk's office, the Oversight Board, and the Creditors' Committee at the following addresses:

Clerk's Office
United States District Court
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Counsel for the Oversight Board
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036-8299
Attn: Martin J. Bienenstock
Brian S. Rosen

Counsel for the Creditors' Committee
Paul Hastings LLP
200 Park Avenue
New York, New York 10166
Attn: Luc A. Despins
G. Alexander Bongartz

YOUR RESPONSE must be mailed so as to be received by the Clerk's Office, the Oversight Board, and the Creditors' Committee no later than **4:00 pm (Atlantic Standard Time)** on

[Date], unless otherwise extended by [Debtor], in writing, or upon a written request to the Court and order of the Court extending the deadline.

In the event that you are unable to file and serve a response online or by mail as specified above, you may file a response in person at the following address by no later than **4:00 pm (Atlantic Standard Time)** on [Date], unless otherwise extended by [Debtor], in writing, or upon a written request to the Court and order of the Court extending the deadline:

Clerk's Office
United States District Court
#150 Chardon Avenue
Federal Building
San Juan, Puerto Rico 00918

A certificate of service should be included with your response explaining how service was accomplished.

If you have any questions about filing and serving a response, including questions about the Court's case filing system, please contact the **Prime Clerk hotline at (844) 822-9231**.

Reservation of Rights. NOTHING IN THE OMNIBUS OBJECTION OR THIS NOTICE IS OR SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF [DEBTOR] OR ANY OTHER PARTY IN INTEREST IN THE TITLE III CASES TO DISPUTE ANY CLAIMS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, OR DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE NOTICE THEREOF AT SUCH TIME.

Additional Resources and Who to Contact with Questions

All documents filed in the Title III Cases, including copies of claims filed using CM/ECF, are available free online at <https://cases.primeclerk.com/puertorico>. This website is maintained by Prime Clerk and includes a searchable database to assist with locating documents.

If you require additional information regarding the Omnibus Objection, the status of your response, your claim, or this notice, please contact the Prime Clerk hotline at **(844) 822-9231** (toll free for U.S. and Puerto Rico) or **(646) 486-7944** (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available). Inquiries may also be sent via email to puertoricoinfo@primeclerk.com.

ANEXO 2

Versiones en inglés y en español del Formulario de Notificación de Objeciones Colectivas contra Reclamaciones que son incongruentes con los libros y registros de los Deudores

**TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS
PARA EL DISTRITO DE PUERTO RICO**

En el caso:

LA JUNTA DE SUPERVISIÓN Y
ADMINISTRACIÓN FINANCIERA PARA PUERTO
RICO,

como representante del

ESTADO LIBRE ASOCIADO DE PUERTO RICO, *y otros*,

Deudores.

PROMESA

Título III

Nº 17 BK 3283-LTS

(Administrados en forma conjunta)

**NOTIFICACIÓN DE LA [###] OBJECIÓN COLECTIVA (SUBSTANTIVA) DE
[DEUDOR] CONTRA LAS RECLAMACIONES INCONGRUENTES**

**CONFIRME SI SU RECLAMACIÓN SE FIGURA EN LA LISTA DEL ANEXO A A
ESTA OBJECIÓN COLECTIVA. LA OBJECIÓN COLECTIVA SOLO PRETENDE
MODIFICAR SUS DERECHOS SI SU RECLAMACIÓN SE FIGURA EN LA LISTA
DEL ANEXO A A LA OBJECIÓN COLECTIVA. CUALQUIER RECLAMACIÓN
QUE SEA DESESTIMADA EN SU TOTALIDAD SERÁ CONSIDERADA COMO SI
NUNCA SE HUBIESE PRESENTADO.**

**SI SU RECLAMACIÓN SE FIGURA EN LA LISTA DEL ANEXO A, [DEUDOR]
PRETENDE QUE SE DESESTIME SU RECLAMACIÓN TOTAL O
PARCIALMENTE PORQUE ES INCONGRUENTE CON LOS LIBROS Y
REGISTROS DE [DEUDOR]. EL ANEXO A IDENTIFICA EL MONTO DE LA
RECLAMACIÓN, SI LO HUBIERE, QUE SURGE DE LOS LIBROS Y REGISTROS
DEL [DEUDOR].**

**DEBE LEER ESTA NOTIFICACIÓN Y LA OBJECIÓN COLECTIVA
DETENIDAMENTE Y ANALIZARLAS CON SU ABOGADO. SI NO TIENE UN
ABOGADO, LE RECOMENDAMOS QUE CONSULTE A UNO.**

QUEDA INFORMADO de que, el [FECHA], [Deudor], por intermedio de la Junta de Supervisión y Administración Financiera para Puerto Rico (la “Junta de Supervisión”), en carácter de representante de [Deudor] conforme a la sección 315(b) de la *Ley de Supervisión, Administración y Estabilidad de Puerto Rico* (“PROMESA”),¹ presentó la [###] *Objeción Colectiva (Sustantiva) de [Deudor] a las Reclamaciones Incongruentes* (la “Objeción

¹ La ley PROMESA está codificada en el título 48 del Código de los Estados Unidos (United States’ Code, U.S.C.) §§ 2101-2241.

Colectiva") ante el Tribunal de Distrito de Estados Unidos para el Distrito de Puerto Rico (el "Tribunal"),² una copia de la cual se adjunta a esta notificación.

RESUMEN

- **VERIFIQUE SI SUS RECLAMACIONES FIGURAN EN LA LISTA DEL ANEXO A A LA OBJECIÓN COLECTIVA.**
- Si su(s) reclamación(es) NO está(n) figurada(s) en la lista del Anexo A, esta(s) no se verán afectadas por la Objeción Colectiva, y usted NO necesita hacer nada.
- Si su(s) reclamación(es) figura(n) en la lista del Anexo A a la Objeción Colectiva, [Deudor] pretende que se desestime(n) su(s) reclamación(es) figuradas en el Anexo A porque, como se explica en la Objeción Colectiva adjunta, [la documentación que usted aportó en respaldo de su Reclamación es incongruente con [los libros y registros de [Deudor].] El monto que figura en el Anexo A corresponde al monto de la reclamación, si lo hubiere, que surge de los libros y registros de [Deudor].
- Las copias de la Objeción Colectiva y de las demás presentaciones en los Casos al amparo del Título III están disponibles de forma gratuita en línea en <https://cases.primeclerk.com/puertorico>.
- **Si tiene preguntas, comuníquese con Prime Clerk al (844) 822-9231 (número gratuito para EE.UU. y Puerto Rico) o al (646) 486-7944 (para llamadas internacionales), disponible de 10:00 a.m. a 7:00 p.m. (Hora Estándar del Atlántico) (Disponible en español).**

SI USTED NO RESPONDE DE CONFORMIDAD CON ESTA NOTIFICACIÓN, EL TRIBUNAL PODRÍA OTORGAR EL REMEDIO SOLICITADO POR LA OBJECIÓN COLECTIVA SIN MEDIAR NOTIFICACIÓN O AUDIENCIA POSTERIOR.

² Los términos en mayúscula no definidos en el presente tendrán los significados que se les atribuye en la Objeción Colectiva.

AVISO IMPORTANTE CONFORME A LA REGLA LOCAL 3007-1

Toda parte a quien se haya notificado esta Objeción Colectiva, o alguna otra parte de esta acción que cuestione la reparación aquí pretendida, debe notificar y presentar una respuesta a la Objeción Colectiva en la oficina del Secretario del Tribunal de Distrito de Estados Unidos para el Distrito de Puerto Rico antes de las **4:00 pm (Hora Estándar del Atlántico)** del **[Fecha]** a menos que el plazo sea prorrogado, por escrito, por **[Deudor]**. Si no se presenta la respuesta dentro del plazo aquí establecido, la Objeción Colectiva se considerará sin oposición y podrá ser otorgada a menos que: (1) la reparación solicitada estuviere prohibida por ley; (2) la reparación solicitada fuere contraria a la política pública, o (3) a juicio del Tribunal, se debiere actuar de otra forma en aras de la justicia. Si presenta una respuesta en tiempo y forma, el Tribunal podrá programar una audiencia.

Información fundamental para los Demandantes que opten por presentar una Respuesta

Quiénes están obligados a presentar una Respuesta. Cualquier parte que se oponga a la Objeción Colectiva deberá presentar una respuesta de conformidad con los procedimientos aquí establecidos. Si una parte cuya reclamación estuviere sujeta a la Objeción Colectiva no presenta ni notifica una respuesta en cumplimiento de los procedimientos descritos en el presente, el Tribunal podrá hacer lugar a la Objeción Colectiva con respecto a dicha reclamación, sin necesidad de cursar una notificación ulterior al demandante.

Quiénes NO están obligados a presentar una respuesta. Si usted no se opone a la desestimación total o parcial de su(s) reclamación(es) que se figuran en la lista del Anexo A a la Objeción Colectiva, entonces usted no necesita presentar una respuesta por escrito a la Objeción Colectiva y no es necesario que comparezca a la audiencia en que se tratará la Objeción Colectiva (que se describe a continuación). Además, la Objeción Colectiva solo se aplica a las reclamaciones que figuran en el Anexo A a la Objeción Colectiva, cuya copia puede consultarse de manera gratuita en línea, en <https://cases.primeclerk.com/puertorico>. No se requiere ninguna respuesta si su reclamación no figura del Anexo A a la Objeción Colectiva.

Fecha límite para presentar una Respuesta. Su respuesta se considerará oportuna **solo si** es presentada ante el Tribunal **y** notificada antes de las **4:00 pm (Hora Estándar del Atlántico)** del **[Fecha]**, a menos que el plazo sea prorrogado, por escrito, por **[Deudor]** o cuando medie una solicitud por escrito ante el Tribunal y una resolución del Tribunal que prorroga la fecha límite.

La fecha límite para presentar y notificar una respuesta es las 4:00 pm (Hora estándezar del Atlántico) del [Deudor].

Audiencia sobre la Objeción Colectiva. La respuesta correctamente presentada y notificada de acuerdo con este aviso dará lugar a la realización de una audiencia sobre la Objeción Colectiva y la respuesta a las **9:30 a.m. (Hora estándezar del Atlántico) del [Fecha]**, ante la Honorable Jueza Laura Taylor Swain en el Tribunal de Distrito de Estados Unidos para el

Distrito de Puerto Rico, ubicado en 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767. Si usted presenta una respuesta a la Objeción Colectiva, deberá entonces prepararse para comparecer en la audiencia sobre la Objeción Colectiva. [Deudor], sin embargo, se reserva el derecho, con tres (3) días hábiles de antelación, de postergar la audiencia en la que se trate la Objeción Colectiva y la respuesta.

Los Deudores podrán presentar una contestación a su respuesta o responder mediante un alegato oral en la audiencia. Los Deudores podrán presentar su respuesta a más tardar siete (7) días calendario antes de la audiencia sobre la Objeción Colectiva y la respuesta.

EL TRIBUNAL SOLO TOMARÁ EN CONSIDERACIÓN SU RESPUESTA SI ESTA PRESENTADA Y NOTIFICADA ANTES O EN LA FECHA LÍMITE PARA PRESENTAR RESPUESTAS, DE CONFORMIDAD CON LAS INSTRUCCIONES INDICADAS EN ESTE AVISO.

Qué debe presentarse junto con una Respuesta. La respuesta a la Objeción Colectiva debe contener la siguiente información.

- (v) **Información de Contacto.** La respuesta debe incluir un **nombre, dirección, número de teléfono, y dirección de correo electrónico** del (1) reclamante que responde; (2) el abogado o representante designado del reclamante a quien los abogados de [Deudor] deben notificar una réplica a la respuesta, si la hubiere; o (3) la parte con facultades para conciliar, liquidar o de otro modo resolver la Objeción Colectiva en representación del reclamante.
- (vi) **Título.** La respuesta debe contener un título que indique el nombre del Tribunal, los nombres de los Deudores, el número de caso, el título de la Objeción Colectiva a la cual está dirigida la respuesta y el o los números de evidencias de reclamaciones relacionadas otorgados por Prime Clerk (que se figuran en el Anexo A a la Objeción Colectiva y que están disponibles de forma gratuita en línea, en <https://cases.primeclerk.com/puertorico>).
- (vii) **La o las razones para oponerse a la Objeción Colectiva.** La respuesta debe contener una declaración concisa que indique las razones por las cuales el Tribunal no debería hacer lugar a la Objeción Colectiva con respecto a su Reclamación, incluidos los fundamentos fácticos y jurídicos que esgrimirá el demandante para oponerse a la Objeción Colectiva.
- (viii) **Documentación de Respaldo.** En la medida en que no se haya incluido ya en la evidencia de la reclamación, la respuesta debe incluir una copia de cualquier otra documentación o evidencia, con base en la cual el reclamante habrá de fundamentar su oposición a la Objeción Colectiva; con la salvedad, sin embargo, de que reclamante no estará obligado a revelar en la respuesta información confidencial, propia o de otro modo protegida; y con la salvedad, asimismo, de que el reclamante deberá revelar a [Deudor] toda la información y proporcionarle copias de todos los documentos que el reclamante considere confidenciales, propios o de otro modo protegidos, y en los cuales este tenga intención de basarse para fundamentar su reclamación, con sujeción a las limitaciones de confidencialidad que sean

pertinentes.

Dónde y cómo presentar y notificar una Respuesta. Todas las respuestas deben presentarse de manera electrónica al Tribunal en el expediente *en el cual figure: Estado Libre Asociado de Puerto Rico*, No. de Caso 17 BK 3283-LTS. Existen dos métodos que usted puede emplear para presentar su respuesta:

3. **En línea.** Los usuarios registrados del sistema de archivo de casos del Tribunal deben presentar su respuesta de forma electrónica en formato PDF con opción de búsqueda.
4. **Por correo postal.** Si usted no es un abogado que sea usuario registrado del sistema de archivo de casos del Tribunal, puede presentar y notificar una respuesta mediante correo postal a la oficina del Secretario del Tribunal, el Comité de Supervisión y el Comité de Acreedores, a los siguientes domicilios:

Oficina del Secretario
Tribunal de Distrito de los Estados Unidos
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Abogado de la Junta de Supervisión
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036-8299
Atención: Martin J. Bienenstock
Brian S. Rosen

Abogado del Comité de Acreedores
Paul Hastings LLP
200 Park Avenue
New York, New York 10166
Atención: Luc A. Despins
G. Alexander Bongartz

SU RESPUESTA debe ser enviada por correo postal para ser recibida en la oficina del Secretario, la Junta de Supervisión y el Comité de Acreedores a más tardar a las **4:00 p.m. (Hora Estándar del Atlántico)** del [Fecha], a menos que [Deudor] pospusiere esta fecha por escrito, o ante la solicitud escrita dirigida al Tribunal y la resolución de este que pospone la fecha límite.

Si usted no pudiere presentar y notificar una respuesta en línea o por correo postal como se indicó arriba, puede presentar la respuesta en persona en el domicilio que se indica a continuación, a más tardar a las **4:00 p.m. (Hora Estándar del Atlántico)** del [Fecha], a menos que [Deudor] pospusiere esta fecha por escrito, o ante la solicitud escrita dirigida al Tribunal y la resolución de este que pospone la fecha límite.

Oficina del Secretario

Tribunal de Distrito de los Estados Unidos
#150 Chardon Avenue
Federal Building
San Juan, Puerto Rico 00918

Su respuesta debe incluir un certificado de entrega que explique cómo se efectuó la notificación.

Si tiene cualquier pregunta sobre cómo presentar y notificar una respuesta, incluso preguntas sobre el sistema de archivo de casos del Tribunal, póngase en contacto con **la línea de ayuda de Prime Clerk** al **(844) 822-9231**.

Reserva de Derechos. NINGUNA PARTE DE ESTA OBJECIÓN COLECTIVA O NOTIFICACIÓN CONSTITUYE O HABRÁ DE INTERPRETARSE COMO UNA RENUNCIA A NINGUNO DE LOS DERECHOS DE [DEUDOR], O DE CUALQUIER OTRA PARTE INTERESADA EN ESTOS CASOS AL AMPARO DEL TÍTULO III, DE DISPUTAR RECLAMACIONES, FORMULAR RECONVENCIONES, RECLAMAR DERECHOS DE COMPENSACIÓN O REEMBOLSO, PRESENTAR DEFENSAS, OBJETAR RECLAMACIONES (U OTRAS RECLAMACIONES O CUESTIONES DE FONDO DE UN RECLAMANTE) CON CUALQUIER FUNDAMENTO NO EXPUESTO PREVIAMENTE EN UNA OBJECIÓN, A MENOS QUE EL TRIBUNAL HAYA DESESTIMADO LA RECLAMACIÓN O RESUELTO DE OTRA FORMA, O A SOLICITAR LA ESTIMACIÓN DE CUALQUIER RECLAMACIÓN EN UNA FECHA POSTERIOR. LAS PARTES AFECTADAS SERÁN DEBIDAMENTE NOTIFICADAS DE ELLO EN ESE MOMENTO.

Recursos Adicionales y a Quién Contactar para formular Preguntas

Todos los documentos presentados en los Casos iniciados al amparo del Título III, incluidas copias de las reclamaciones presentadas utilizando CM/ECF, se encuentran disponibles de forma gratuita en línea, en <https://cases.primeclerk.com/puertorico>. Este sitio web es mantenido por Prime Clerk y contiene una base de datos apta para búsquedas para ayudar a localizar documentos.

Si necesita obtener información adicional sobre la Objeción Colectiva, el estado de su respuesta, su reclamación o este aviso, póngase en contacto con la línea de ayuda de Prime Clerk llamando al **(844) 822-9231** (sin cargo para EE.UU. y Puerto Rico), o al **(646) 486-7944** (para llamadas internacionales), disponible desde las 10:00 a.m. hasta las 7:00 p.m. (Hora Estándar del Atlántico) (Disponible en español). Las consultas también pueden enviarse por correo electrónico a puertoricoinfo@primeclerk.com.

EXHIBIT 3

**English and Spanish Versions of the Form of Notice for Omnibus Objections based on the
Claim failing to specify the asserted Claim amount or only listing the Claim amount as
“unliquidated,” “undetermined,” or “unknown”**

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

**NOTICE OF [###] OMNIBUS OBJECTION (SUBSTANTIVE) OF [DEBTOR] TO
CLAIMS WITH INSUFFICIENT INFORMATION**

THE OMNIBUS OBJECTION ONLY SEEKS TO ALTER YOUR RIGHTS IF YOUR CLAIM IS LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION. BEFORE RESPONDING, PLEASE CONFIRM WHETHER YOUR CLAIM IS LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION.

IF YOUR CLAIM IS LISTED ON EXHIBIT A, [DEBTOR] IS SEEKING TO DISALLOW YOUR CLAIM IN WHOLE OR IN PART OR TO LIQUIDATE YOUR CLAIM BECAUSE IT FAILED TO SPECIFY AN ASSERTED CLAIM AMOUNT AND/OR LISTED THE ASSERTED CLAIM AMOUNT AS UNLIQUIDATED, UNDETERMINED, OR UNKNOWN. THE AMOUNT LISTED ON EXHIBIT A IS THE AMOUNT, IF ANY, [DEBTOR] BELIEVES IN GOOD FAITH SHOULD BE ALLOWED.

YOU SHOULD READ THIS NOTICE AND THE OMNIBUS OBJECTION CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE. ANY CLAIM OR PORTION OF A CLAIM THAT IS DISALLOWED WILL BE TREATED AS THOUGH IT WERE NEVER FILED.

PLEASE TAKE NOTICE THAT, on [Date], the [Debtor], by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as [Debtor]’s representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),¹ filed the [###] *Omnibus Objection of [Debtor]*

¹ PROMESA is codified at 48 U.S.C. §§ 2101-2241.

(Substantive) to Claims With Insufficient Information (the “Omnibus Objection”) with the United States District Court for the District of Puerto Rico (the “Court”),² a copy of which is attached to this notice.

OVERVIEW

- **PLEASE CHECK IF YOUR CLAIM(S) IS/ARE LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION.**
- If your claim(s) is/are NOT listed on Exhibit A, your claim(s) will not be affected by the Omnibus Objection, and you DO NOT have to do anything.
- If your claim(s) is/are listed on Exhibit A to the Omnibus Objection, [Debtor] is seeking to disallow your claim(s) listed on Exhibit A or to liquidate your claim(s) listed on Exhibit A because, as explained in the accompanying Omnibus Objection, you failed to specify an asserted claim amount, and/or you listed your claim amount as unliquidated, undetermined, or unknown and [Debtor] believes that the claim(s) should be disallowed in whole or in part or liquidated at a particular amount. The amount listed on Exhibit A is the amount, if any, that [Debtor] believes in good faith should be allowed.
- Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>.
- **If you have questions, please contact Prime Clerk at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).**

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OMNIBUS OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

IMPORTANT NOTICE PURSUANT TO LOCAL RULE 3007-1

Any party against whom this Omnibus Objection has been served, or any other party to the action who objects to the relief sought herein, shall serve and file a response to the Omnibus Objection with the clerk’s office of the United States District Court for the District of Puerto Rico by **4:00 pm (Atlantic Standard Time)** on **[Date]** unless otherwise extended, in writing, by [Debtor]. If no response is filed within the time allowed herein, the Omnibus Objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the Court may schedule a hearing.

² Capitalized terms used but not defined herein shall have the meanings set forth in the Omnibus Objection.

Critical Information for Claimants Choosing to File a Response

Who is Required to File a Response. Any party who disputes the Omnibus Objection is required to file a response in accordance with the procedures set forth herein. If a party whose claim is subject to the Omnibus Objection does not file and serve a response in compliance with the procedures herein, the Court may grant the Omnibus Objection with respect to such claim without further notice to the claimant.

Who is NOT Required to File a Response. If you do not oppose the disallowance in whole or in part of your claim(s) that are listed on Exhibit A to the Omnibus Objection, then you do not need to file a written response to the Omnibus Objection and you do not need to appear at the hearing on the Omnibus Objection (described below). Additionally, the Omnibus Objection only applies to the claims listed on Exhibit A to the Omnibus Objection, a copy of which is available free online at <https://cases.primeclerk.com/puertorico>. No response is required if your claim is not listed on Exhibit A to the Omnibus Objection.

Deadline for Filing a Response. Your response will be deemed timely only if it is filed with the Court and served by **4:00 pm (Atlantic Standard Time)** on [Date], unless otherwise extended, in writing, by [Debtor] or upon written request to the Court and order of the Court extending the deadline.

**The deadline for filing and serving a response is
4:00 pm (Atlantic Standard Time) on [Debtor].**

Hearing on the Omnibus Objection. If a response is properly filed and served in accordance with this notice, a hearing on the Omnibus Objection and the response will be held at **9:30 a.m. (Atlantic Standard Time) on [Date]**, before The Honorable Laura Taylor Swain at the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767. If you file a response to the Omnibus Objection, then you should plan to appear at the hearing on the Omnibus Objection. [Debtor], however, reserves the right, on three (3) business days' notice, to adjourn the hearing with respect to the Omnibus Objection and the response.

The Debtors may file a reply to your response or reply in oral argument at the hearing. The Debtors are permitted to file their reply no later than seven (7) calendar days before the hearing on the Omnibus Objection and the response.

THE COURT WILL ONLY CONSIDER YOUR RESPONSE IF YOUR RESPONSE IS FILED AND SERVED BY THE RESPONSE DEADLINE IN ACCORDANCE WITH THE INSTRUCTIONS SET FORTH IN THIS NOTICE.

What to File with a Response. Your response to the Omnibus Objection must contain the following information.

- (i) **Contact Information.** The response must include a **name, address, telephone number**, and **email address** of either (1) the responding claimant; (2) the claimant's attorney or designated representative to whom the attorneys for [Debtor] should serve a reply to the response, if any; or (3) the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the claimant's behalf.
- (ii) **Caption.** The response must contain a caption stating the name of the Court, the names of the Debtors, the case number, the title of the Omnibus Objection to which the response is directed, and the proof of claim number(s) related thereto from Prime Clerk (which are listed on Exhibit A to the Omnibus Objection and available free online at <https://cases.primeclerk.com/puertorico>).
- (iii) **Reason(s) for Opposing the Omnibus Objection.** The response must contain a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection.
- (iv) **Supporting Documentation.** To the extent not already included with the proof of claim, the response should include a copy of any other documentation or other evidence of the claim, upon which the claimant will rely in opposing the Omnibus Objection; provided, however, that the claimant need not disclose confidential, proprietary, or otherwise protected information in the response; and provided, further, that the claimant shall disclose to [Debtor] all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints.

Where and How to File and Serve a Response. Every response should be filed electronically with the Court on the docket of *In re Commonwealth of Puerto Rico*, Case No. 17 BK 3283-LTS. There are two methods that you can use to file your response:

1. **Online.** Registered users of the Court's case filing system must file their response electronically in searchable portable document format.
2. **By Mail.** If you are not an attorney who is a registered user of the Court's case filing system, you may file and serve a response by mailing it to the Court's Clerk's office, the Oversight Board, and the Creditors' Committee at the following addresses:

Clerk's Office
United States District Court
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Counsel for the Oversight Board
Proskauer Rose LLP
Eleven Times Square

New York, New York 10036-8299
Attn: Martin J. Bienenstock
Brian S. Rosen

Counsel for the Creditors' Committee
Paul Hastings LLP
200 Park Avenue
New York, New York 10166
Attn: Luc A. Despins
G. Alexander Bongartz

YOUR RESPONSE must be mailed so as to be received by the Clerk's Office, the Oversight Board, and the Creditors' Committee no later than **4:00 pm (Atlantic Standard Time)** on **[Date]**, unless otherwise extended by [Debtor], in writing, or upon a written request to the Court and order of the Court extending the deadline.

In the event that you are unable to file and serve a response online or by mail as specified above, you may file a response in person at the following address by no later than **4:00 pm (Atlantic Standard Time)** on **[Date]**, unless otherwise extended by [Debtor], in writing, or upon a written request to the Court and order of the Court extending the deadline:

Clerk's Office
United States District Court
#150 Chardon Avenue
Federal Building
San Juan, Puerto Rico 00918

A certificate of service should be included with your response explaining how service was accomplished.

If you have any questions about filing and serving a response, including questions about the Court's case filing system, please contact the **Prime Clerk hotline at (844) 822-9231**.

Reservation of Rights. NOTHING IN THE OMNIBUS OBJECTION OR THIS NOTICE IS OR SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF [DEBTOR] OR ANY OTHER PARTY IN INTEREST IN THE TITLE III CASES TO DISPUTE ANY CLAIMS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, OR DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE NOTICE THEREOF AT SUCH TIME.

Additional Resources and Who to Contact with Questions

All documents filed in the Title III Cases, including copies of claims filed using CM/ECF, are available free online at <https://cases.primeclerk.com/puertorico>. This website is maintained by Prime Clerk and includes a searchable database to assist with locating documents.

If you require additional information regarding the Omnibus Objection, the status of your response, your claim, or this notice, please contact the Prime Clerk hotline at **(844) 822-9231** (toll free for U.S. and Puerto Rico) or **(646) 486-7944** (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available). Inquiries may also be sent via email to puertoricoinfo@primeclerk.com.

ANEXO 3

Versiones en inglés y español del Formulario de Notificación de las Objeciones Colectivas contra Reclamaciones que no especifican el monto pretendido de la Reclamación o que solo indican el monto de la Reclamación como “sin liquidar,” “sin determinar,” o “desconocido”

**TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS
PARA EL DISTRITO DE PUERTO RICO**

En el caso:

LA JUNTA DE SUPERVISIÓN Y
ADMINISTRACIÓN FINANCIERA PARA PUERTO
RICO,

como representante del

ESTADO LIBRE ASOCIADO DE PUERTO RICO, *y otros*,

Deudores.

PROMESA

Título III

Nº 17 BK 3283-LTS

(Administrados en forma conjunta)

**NOTIFICACIÓN DE [###] OBJECIÓN COLECTIVA (SUSTANTIVA) DE [DEUDOR]
CONTRA RECLAMACIONES CON INFORMACIÓN INSUFICIENTE**

LA OBJECIÓN COLECTIVA SOLO PRETENDE MODIFICAR SUS DERECHOS SI SU RECLAMACIÓN SE FIGURA EN LA LISTA DEL ANEXO A A LA OBJECIÓN COLECTIVA. ANTES DE RESPONDER, CONFIRME SI SU RECLAMACIÓN FIGURA EN LA LISTA DEL ANEXO A A LA OBJECIÓN COLECTIVA.

SI SU RECLAMACIÓN SE FIGURA EN LA LISTA DEL ANEXO A, [DEUDOR] PRETENDE QUE SE DESESTIME SU RECLAMACIÓN TOTAL O PARCIALMENTE O QUE SE LIQUIDE PORQUE NO SE HA ESPECIFICADO EL MONTO PRETENDIDO POR LA RECLAMACIÓN Y/O INDICA EL MONTO PRETENDIDO COMO SIN LIQUIDAR, SIN DETERMINAR O DESCONOCIDO. EL MONTO INDICADO EN EL ANEXO A ES EL MONTO, SI LO HUBIERE, QUE [DEUDOR] CONSIDERA DE BUENA FE QUE DEBE PERMITIRSE.

DEBE LEER ESTA NOTIFICACIÓN Y LA OBJECIÓN COLECTIVA DETENIDAMENTE Y ANALIZARLAS CON SU ABOGADO. SI NO TIENE UN ABOGADO, LE RECOMENDAMOS QUE CONSULTE A UNO. CUALQUIER RECLAMACIÓN O PARTE DE UNA RECLAMACIÓN QUE SEA DESESTIMADA SERÁ CONSIDERADA COMO SI NUNCA SE HUBIESE PRESENTADO.

QUEDA INFORMADO de que, el [Fecha], [Deudor], por intermedio de la Junta de Supervisión y Administración Financiera para Puerto Rico (la “Junta de Supervisión”), en carácter de representante de [Deudor] conforme a la sección 315(b) de la *Ley de Supervisión*,

Administración y Estabilidad de Puerto Rico (“PROMESA”),¹ presentó la [###] Objeción Colectiva (Sustantiva) de [Deudor] contra Reclamaciones con Información Insuficiente (la “Objeción Colectiva”) ante el Tribunal de Distrito de Estados Unidos para el Distrito de Puerto Rico (el “Tribunal”),² una copia de la cual se adjunta a esta notificación.

RESUMEN

- **VERIFIQUE SI SUS RECLAMACIONES FIGURAN EN LA LISTA DEL ANEXO A A LA OBJECIÓN COLECTIVA.**
- Si su(s) reclamación(es) NO está(n) figurada(s) en la lista del Anexo A, esta(s) no se verán afectadas por la Objeción Colectiva, y usted NO necesita hacer nada.
- Si su(s) reclamación(es) figura(n) en la lista del Anexo A a la Objeción Colectiva, [Deudor] pretende que se desestime(n) su(s) reclamación(es) figuradas en el Anexo A o que se cuantifica(n) el monto o los montos de su(s) reclamación(es) porque, como se explica en la Objeción Colectiva adjunta, usted omitió especificar el monto pretendido de su reclamación, y/o usted indicó el monto de su reclamación como sin liquidar, sin determinar, o desconocido y [DEBTOR] cree que su(s) reclamación(es) debe ser desestimadas en su totalidad o en parte o liquidado en un monto determinado. El monto que figura en el Anexo A corresponde al monto de la reclamación, si lo hubiere, que surge de los libros y registros de [Deudor].
- Las copias de la Objeción Colectiva y de las demás presentaciones en los Casos al amparo del Título III están disponibles de forma gratuita en línea en <https://cases.primeclerk.com/puertorico>.
- Si tiene preguntas, comuníquese con Prime Clerk al (844) 822-9231 (número gratuito para EE.UU. y Puerto Rico) o al (646) 486-7944 (para llamadas internacionales), disponible de 10:00 a.m. a 7:00 p.m. (Hora Estándar del Atlántico) (Disponible en español).

SI USTED NO RESPONDE DE CONFORMIDAD CON ESTA NOTIFICACIÓN, EL TRIBUNAL PODRÍA OTORGAR EL REMEDIO SOLICITADO POR LA OBJECIÓN COLECTIVA SIN MEDIAR NOTIFICACIÓN O AUDIENCIA POSTERIOR.

¹ La ley PROMESA está codificada en el título 48 del Código de los Estados Unidos (United States' Code, U.S.C.) §§ 2101-2241.

² Los términos en mayúscula no definidos en el presente tendrán los significados que se les atribuye en la Objeción Colectiva.

AVISO IMPORTANTE CONFORME A LA REGLA LOCAL 3007-1

Toda parte a quien se haya notificado esta Objeción Colectiva, o alguna otra parte de esta acción que cuestione la reparación aquí pretendida, debe notificar y presentar una respuesta a la Objeción Colectiva en la oficina del Secretario del Tribunal de Distrito de Estados Unidos para el Distrito de Puerto Rico antes de las **4:00 pm (Hora Estándar del Atlántico)** del **[Fecha]** a menos que el plazo sea prorrogado, por escrito, por **[Deudor]**. Si no se presenta la respuesta dentro del plazo aquí establecido, la Objeción Colectiva se considerará sin oposición y podrá ser otorgada a menos que: (1) la reparación solicitada estuviere prohibida por ley; (2) la reparación solicitada fuere contraria a la política pública, o (3) a juicio del Tribunal, se debiere actuar de otra forma en aras de la justicia. Si presenta una respuesta en tiempo y forma, el Tribunal podrá programar una audiencia.

Información fundamental para los Demandantes que opten por presentar una Respuesta

Quiénes están obligados a presentar una Respuesta. Cualquier parte que se oponga a la Objeción Colectiva deberá presentar una respuesta de conformidad con los procedimientos aquí establecidos. Si una parte cuya reclamación estuviere sujeta a la Objeción Colectiva no presenta ni notifica una respuesta en cumplimiento de los procedimientos descritos en el presente, el Tribunal podrá hacer lugar a la Objeción Colectiva con respecto a dicha reclamación, sin necesidad de cursar una notificación ulterior al demandante.

Quiénes NO están obligados a presentar una respuesta. Si usted no se opone a la desestimación total o parcial de su(s) reclamación(es) que se figuran en la lista del Anexo A a la Objeción Colectiva, entonces usted no necesita presentar una respuesta por escrito a la Objeción Colectiva y no es necesario que comparezca a la audiencia en que se tratará la Objeción Colectiva (que se describe a continuación). Además, la Objeción Colectiva solo se aplica a las reclamaciones que figuran en el Anexo A a la Objeción Colectiva, cuya copia puede consultarse de manera gratuita en línea, en <https://cases.primeclerk.com/puertorico>. No se requiere ninguna respuesta si su reclamación no aparece en la lista del Anexo A a la Objeción Colectiva.

Fecha límite para presentar una Respuesta. Su respuesta se considerará oportuna **solo si** es presentada ante el Tribunal **y** notificada antes de las **4:00 pm (Hora Estándar del Atlántico)** del **[Fecha]**, a menos que el plazo sea prorrogado, por escrito, por **[Deudor]** o cuando medie una solicitud por escrito ante el Tribunal y una resolución del Tribunal que prorroga la fecha límite.

La fecha límite para presentar y notificar una respuesta es las 4:00 pm (Hora estándezar del Atlántico) del [Deudor].

Audiencia sobre la Objeción Colectiva. La respuesta correctamente presentada y notificada de acuerdo con este aviso dará lugar a la realización de una audiencia sobre la Objeción Colectiva y la respuesta a las **9:30 a.m. (Hora estándezar del Atlántico) del [Fecha]**, ante la Honorable Jueza Laura Taylor Swain en el Tribunal de Distrito de Estados Unidos para el

Distrito de Puerto Rico, ubicado en 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767. Si usted presenta una respuesta a la Objeción Colectiva, deberá entonces prepararse para comparecer en la audiencia sobre la Objeción Colectiva. [Deudor], sin embargo, se reserva el derecho, con tres (3) días hábiles de antelación, de postergar la audiencia en la que se trate la Objeción Colectiva y la respuesta.

Los Deudores podrán presentar una contestación a su respuesta o responder mediante un alegato oral en la audiencia. Los Deudores podrán presentar su respuesta a más tardar siete (7) días calendario antes de la audiencia sobre la Objeción Colectiva y la respuesta.

EL TRIBUNAL SOLO TOMARÁ EN CONSIDERACIÓN SU RESPUESTA SI ESTA PRESENTADA Y NOTIFICADA ANTES O EN LA FECHA LÍMITE PARA PRESENTAR RESPUESTAS, DE CONFORMIDAD CON LAS INSTRUCCIONES INDICADAS EN ESTE AVISO.

Qué debe presentarse junto con una Respuesta. La respuesta a la Objeción Colectiva debe contener la siguiente información.

- (v) **Información de Contacto.** La respuesta debe incluir un **nombre, dirección, número de teléfono, y dirección de correo electrónico** del (1) reclamante que responde; (2) el abogado o representante designado del reclamante a quien los abogados de [Deudor] deben notificar una réplica a la respuesta, si la hubiere; o (3) la parte con facultades para conciliar, liquidar o de otro modo resolver la Objeción Colectiva en representación del reclamante.
- (vi) **Título.** La respuesta debe contener un título que indique el nombre del Tribunal, los nombres de los Deudores, el número de caso, el título de la Objeción Colectiva a la cual está dirigida la respuesta y el o los números de evidencias de reclamaciones relacionadas otorgados por Prime Clerk (que figuran en el Anexo A a la Objeción Colectiva y que están disponibles de forma gratuita en línea, en <https://cases.primeclerk.com/puertorico>).
- (vii) **La o las razones para oponerse a la Objeción Colectiva.** La respuesta debe contener una declaración concisa que indique las razones por las cuales el Tribunal no debería hacer lugar a la Objeción Colectiva con respecto a su Reclamación, incluidos los fundamentos fácticos y jurídicos que esgrimirá el demandante para oponerse a la Objeción Colectiva.
- (viii) **Documentación de Respaldo.** En la medida en que no se haya incluido ya en la evidencia de la reclamación, la respuesta debe incluir una copia de cualquier otra documentación o evidencia, con base en la cual el reclamante habrá de fundamentar su oposición a la Objeción Colectiva; con la salvedad, sin embargo, de que reclamante no estará obligado a revelar en la respuesta información confidencial, propia o de otro modo protegida; y con la salvedad, asimismo, de que el reclamante deberá revelar a [Deudor] toda la información y proporcionarle copias de todos los documentos que el reclamante considere confidenciales, propios o de otro modo protegidos, y en los cuales este tenga intención de basarse para fundamentar su reclamación, con sujeción a las limitaciones de confidencialidad que sean

pertinentes.

Dónde y cómo presentar y notificar una Respuesta. Todas las respuestas deben presentarse de manera electrónica al Tribunal en el expediente *en el cual figure: Estado Libre Asociado de Puerto Rico*, No. de Caso 17 BK 3283-LTS. Existen dos métodos que usted puede emplear para presentar su respuesta:

3. **En línea.** Los usuarios registrados del sistema de archivo de casos del Tribunal deben presentar su respuesta de forma electrónica en formato PDF con opción de búsqueda.
4. **Por correo postal.** Si usted no es un abogado que sea usuario registrado del sistema de archivo de casos del Tribunal, puede presentar y notificar una respuesta mediante correo postal a la oficina del Secretario del Tribunal, el Comité de Supervisión y el Comité de Acreedores, a los siguientes domicilios:

Oficina del Secretario
Tribunal de Distrito de los Estados Unidos
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Abogado la Junta de Supervisión
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036-8299
Atención: Martin J. Bienenstock
Brian S. Rosen

Abogado del Comité de Acreedores
Paul Hastings LLP
200 Park Avenue
New York, New York 10166
Atención: Luc A. Despins
G. Alexander Bongartz

SU RESPUESTA debe enviarse por correo postal para ser recibida en la oficina del Secretario, la Junta de Supervisión y el Comité de Acreedores a más tardar a las **4:00 p.m. (Hora Estándar del Atlántico)** del [Fecha], a menos que [Deudor] pospusiere esta fecha por escrito, o ante la solicitud escrita dirigida al Tribunal y la resolución de este que pospone la fecha límite.

Si usted no pudiere presentar y notificar una respuesta en línea o por correo postal como se indicó arriba, puede presentar la respuesta en persona en el domicilio que se indica a continuación, a más tardar a las **4:00 p.m. (Hora Estándar del Atlántico)** del [Fecha], a menos que [Deudor] pospusiere esta fecha por escrito, o ante la solicitud escrita dirigida al Tribunal y la resolución de este que pospone la fecha límite.

Oficina del Secretario

Tribunal de Distrito de los Estados Unidos
#150 Chardon Avenue
Federal Building
San Juan, Puerto Rico 00918

Su respuesta debe incluir un certificado de entrega que explique cómo se efectuó la notificación.

Si tiene cualquier pregunta sobre cómo presentar y notificar una respuesta, incluso preguntas sobre el sistema de archivo de casos del Tribunal, póngase en contacto con **la línea de ayuda de Prime Clerk** al **(844) 822-9231**.

Reserva de Derechos. NINGUNA PARTE DE ESTA OBJECIÓN COLECTIVA O NOTIFICACIÓN CONSTITUYE O HABRÁ DE INTERPRETARSE COMO UNA RENUNCIA A NINGUNO DE LOS DERECHOS DE [DEUDOR], O DE CUALQUIER OTRA PARTE INTERESADA EN ESTOS CASOS AL AMPARO DEL TÍTULO III, DE DISPUTAR RECLAMACIONES, FORMULAR RECONVENCIONES, RECLAMAR DERECHOS DE COMPENSACIÓN O REEMBOLSO, PRESENTAR DEFENSAS, OBJETAR RECLAMACIONES (U OTRAS RECLAMACIONES O CUESTIONES DE FONDO DE UN RECLAMANTE) CON CUALQUIER FUNDAMENTO NO EXPUESTO PREVIAMENTE EN UNA OBJECIÓN, A MENOS QUE EL TRIBUNAL HAYA DESESTIMADO LA RECLAMACIÓN O RESUELTO DE OTRA FORMA, O A SOLICITAR LA ESTIMACIÓN DE CUALQUIER RECLAMACIÓN EN UNA FECHA POSTERIOR. LAS PARTES AFECTADAS SERÁN DEBIDAMENTE NOTIFICADAS DE ELLO EN ESE MOMENTO.

Recursos Adicionales y a Quién Contactar para formular Preguntas

Todos los documentos presentados en los Casos iniciados al amparo del Título III, incluidas copias de las reclamaciones presentadas utilizando CM/ECF, se encuentran disponibles de forma gratuita en línea, en <https://cases.primeclerk.com/puertorico>. Este sitio web es mantenido por Prime Clerk y contiene una base de datos apta para búsquedas para ayudar a localizar documentos.

Si necesita obtener información adicional sobre la Objeción Colectiva, el estado de su respuesta, su reclamación o este aviso, póngase en contacto con la línea de ayuda de Prime Clerk llamando al **(844) 822-9231** (sin cargo para EE.UU. y Puerto Rico), o al **(646) 486-7944** (para llamadas internacionales), disponible desde las 10:00 a.m. hasta las 7:00 p.m. (Hora Estándar del Atlántico) (Disponible en español). Las consultas también pueden enviarse por correo electrónico a puertoricoinfo@primeclerk.com.

EXHIBIT 4

**English and Spanish Versions of the Form of Notice for Omnibus Objections based on the
Claim Seeking Recovery of Amounts for which the Debtor(s) are not Liable**

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

**NOTICE OF [###] OMNIBUS OBJECTION (SUBSTANTIVE) OF [DEBTOR] TO
CLAIMS AS TO WHICH THE DEBTOR HAS NO LIABILITY**

**IF YOUR CLAIM IS LISTED ON EXHIBIT A, [DEBTOR] IS SEEKING TO
DISALLOW YOUR CLAIM IN WHOLE OR IN PART BECAUSE YOUR CLAIM
SEEKS RECOVERY OF AN AMOUNT FOR WHICH [DEBTOR] IS NOT LIABLE.
ANY CLAIM THAT IS DISALLOWED WILL BE TREATED AS THOUGH IT WERE
NEVER FILED.**

**IF YOUR CLAIM IS LISTED ON EXHIBIT A, YOU SHOULD READ THIS NOTICE
AND THE OMNIBUS OBJECTION CAREFULLY AND DISCUSS IT WITH YOUR
ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO
CONSULT ONE.**

PLEASE TAKE NOTICE THAT, on [Date], the [Debtor], by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as [Debtor]’s representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),¹ filed the *[###] Omnibus Objection of [Debtor] (Substantive) to No Liability Claims* (the “Omnibus Objection”) with the United States District Court for the District of Puerto Rico (the “Court”),² a copy of which is attached to this notice.

¹ PROMESA is codified at 48 U.S.C. §§ 2101-2241.

² Capitalized terms used but not defined herein shall have the meanings set forth in the Omnibus Objection.

OVERVIEW

- PLEASE CHECK IF YOUR CLAIM(S) IS/ARE LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION.
- If your claim(s) is/are NOT listed on Exhibit A, your claim(s) will not be affected by the Omnibus Objection, and you DO NOT have to do anything.
- If your claim(s) is/are listed on Exhibit A to the Omnibus Objection, [Debtor] is seeking to disallow your claim(s) listed on Exhibit A because, as explained in the accompanying Omnibus Objection, you seek recovery of an amount for which [Debtor] is not liable. The Omnibus Objection provides the bases on which [Debtor] believes it is not liable.
- Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>.
- If you have questions, please contact Prime Clerk at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OMNIBUS OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

IMPORTANT NOTICE PURSUANT TO LOCAL RULE 3007-1

Any party against whom this Omnibus Objection has been served, or any other party to the action who objects to the relief sought herein, shall serve and file a response to the Omnibus Objection with the clerk's office of the United States District Court for the District of Puerto Rico by **4:00 pm (Atlantic Standard Time)** on **[Date]** unless otherwise extended, in writing, by [Debtor]. If no response is filed within the time allowed herein, the Omnibus Objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the Court may schedule a hearing.

Critical Information for Claimants Choosing to File a Response

Who is Required to File a Response. Any party who disputes the Omnibus Objection is required to file a response in accordance with the procedures set forth herein. If a party whose claim is subject to the Omnibus Objection does not file and serve a response in compliance with the procedures herein, the Court may grant the Omnibus Objection with respect to such claim without further notice to the claimant.

Who is NOT Required to File a Response. If you do not oppose the disallowance in whole or in part of your claim(s) that are listed on Exhibit A to the Omnibus Objection, then you do not need to file a written response to the Omnibus Objection and you do not need to appear at the hearing on the Omnibus Objection (described below). Additionally, the Omnibus Objection only applies to the claims listed on Exhibit A to the Omnibus Objection, a copy of which is available free online at <https://cases.primeclerk.com/puertorico>. No response is required if your claim is not listed on Exhibit A to the Omnibus Objection.

Deadline for Filing a Response. Your response will be deemed timely only if it is filed with the Court and served by **4:00 pm (Atlantic Standard Time)** on **[Date]**, unless otherwise extended, in writing, by [Debtor] or upon written request to the Court and order of the Court extending the deadline.

**The deadline for filing and serving a response is
4:00 pm (Atlantic Standard Time) on [Debtor].**

Hearing on the Omnibus Objection. If a response is properly filed and served in accordance with this notice, a hearing on the Omnibus Objection and the response will be held at **9:30 a.m. (Atlantic Standard Time) on [Date]**, before The Honorable Laura Taylor Swain at the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767. If you file a response to the Omnibus Objection, then you should plan to appear at the hearing on the Omnibus Objection. [Debtor], however, reserves the right, on three (3) business days' notice, to adjourn the hearing with respect to the Omnibus Objection and the response.

The Debtors may file a reply to your response or reply in oral argument at the hearing. The Debtors are permitted to file their reply no later than seven (7) calendar days before the hearing on the Omnibus Objection and the response.

**THE COURT WILL ONLY CONSIDER YOUR RESPONSE IF YOUR RESPONSE IS
FILED AND SERVED BY THE RESPONSE DEADLINE IN ACCORDANCE WITH
THE INSTRUCTIONS SET FORTH IN THIS NOTICE.**

What to File with a Response. Your response to the Omnibus Objection must contain the following information.

- (i) **Contact Information.** The response must include a **name, address, telephone number, and email address** of either (1) the responding claimant; (2) the claimant's attorney or designated representative to whom the attorneys for [Debtor] should serve a reply to the response, if any; or (3) the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the claimant's behalf.
- (ii) **Caption.** The response must contain a caption stating the name of the Court, the names of the Debtors, the case number, the title of the Omnibus Objection to which

the response is directed, and the proof of claim number(s) related thereto from Prime Clerk (which are listed on Exhibit A to the Omnibus Objection and available free online at <https://cases.primeclerk.com/puertorico>).

- (iii) **Reason(s) for Opposing the Omnibus Objection.** The response must contain a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection.
- (iv) **Supporting Documentation.** To the extent not already included with the proof of claim, the response should include a copy of any other documentation or other evidence of the claim, upon which the claimant will rely in opposing the Omnibus Objection; provided, however, that the claimant need not disclose confidential, proprietary, or otherwise protected information in the response; and provided, further, that the claimant shall disclose to [Debtor] all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints.

Where and How to File and Serve a Response. Every response should be filed electronically with the Court on the docket of *In re Commonwealth of Puerto Rico*, Case No. 17 BK 3283-LTS. There are two methods that you can use to file your response:

1. **Online.** Registered users of the Court's case filing system must file their response electronically in searchable portable document format.
2. **By Mail.** If you are not an attorney who is a registered user of the Court's case filing system, you may file and serve a response by mailing it to the Court's Clerk's office, the Oversight Board, and the Creditors' Committee at the following addresses:

Clerk's Office
United States District Court
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Counsel for the Oversight Board
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036-8299
Attn: Martin J. Bienenstock
Brian S. Rosen

Counsel for the Creditors' Committee
Paul Hastings LLP
200 Park Avenue
New York, New York 10166
Attn: Luc A. Despins
G. Alexander Bongartz

YOUR RESPONSE must be mailed so as to be received by the Clerk's Office, the Oversight Board, and the Creditors' Committee no later than **4:00 pm (Atlantic Standard Time)** on **[Date]**, unless otherwise extended by [Debtor], in writing, or upon a written request to the Court and order of the Court extending the deadline.

In the event that you are unable to file and serve a response online or by mail as specified above, you may file a response in person at the following address by no later than **4:00 pm (Atlantic Standard Time)** on **[Date]**, unless otherwise extended by [Debtor], in writing, or upon a written request to the Court and order of the Court extending the deadline:

Clerk's Office
United States District Court
#150 Chardon Avenue
Federal Building
San Juan, Puerto Rico 00918

A certificate of service should be included with your response explaining how service was accomplished.

If you have any questions about filing and serving a response, including questions about the Court's case filing system, please contact the **Prime Clerk hotline at (844) 822-9231**.

Reservation of Rights. NOTHING IN THE OMNIBUS OBJECTION OR THIS NOTICE IS OR SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF [DEBTOR] OR ANY OTHER PARTY IN INTEREST IN THE TITLE III CASES TO DISPUTE ANY CLAIMS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, OR DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE NOTICE THEREOF AT SUCH TIME.

Additional Resources and Who to Contact with Questions

All documents filed in the Title III Cases, including copies of claims filed using CM/ECF, are available free online at <https://cases.primeclerk.com/puertorico>. This website is maintained by Prime Clerk and includes a searchable database to assist with locating documents.

If you require additional information regarding the Omnibus Objection, the status of your response, your claim, or this notice, please contact the Prime Clerk hotline at **(844) 822-9231** (toll free for U.S. and Puerto Rico) or **(646) 486-7944** (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available). Inquiries may also be sent via email to puertoricoinfo@primeclerk.com.

ANEXO 4

**Versiones en inglés y en español del Formulario de Notificación de Objeciones Colectivas
contra Reclamaciones que buscan recuperar montos por los cuales el(los) Deudor(es) no
adeuda(n)**

**TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS
PARA EL DISTRITO DE PUERTO RICO**

En el caso:

LA JUNTA DE SUPERVISIÓN Y
ADMINISTRACIÓN FINANCIERA PARA PUERTO
RICO,

como representante del

ESTADO LIBRE ASOCIADO DE PUERTO RICO, *y otros*,

Deudores.

PROMESA

Título III

Nº 17 BK 3283-LTS

(Administrados en forma conjunta)

**NOTIFICACIÓN DE LA [###] OBJECIÓN COLECTIVA (SUSTANTIVA) DE
[DEUDOR] CONTRA RECLAMACIONES POR LOS CUALES QUE EL DEUDOR NO
ES RESPONSABLE**

SI SU RECLAMACIÓN SE FIGURA EN LA LISTA DEL ANEXO A, [DEUDOR] PRETENDE QUE SE DESESTIME SU RECLAMACIÓN TOTAL O PARCIALMENTE PORQUE ESTA PRETENDE RECUPERAR UN MONTO QUE [DEUDOR] NO ADEUDA. CUALQUIER RECLAMACIÓN QUE SEA DESESTIMADA SE CONSIDERARÁ COMO SI NUNCA SE HUBIESE PRESENTADO.

SI SU RECLAMACIÓN SE ENCUENTRA EN LA LISTA DEL ANEXO A, USTED DEBE LEER ESTA NOTIFICACIÓN Y LA OBJECIÓN COLECTIVA CUIDADOSAMENTE Y ANALIZARLA CON SU ABOGADO. SI NO TIENE UN ABOGADO, LE RECOMENDAMOS QUE CONSULTE A UNO.

QUEDA INFORMADO de que, el[Fecha], [Deudor], por intermedio de la Junta de Supervisión y Administración Financiera para Puerto Rico (la “Junta de Supervisión”), en carácter de representante de [Deudor] conforme a la sección 315(b) de la *Ley de Supervisión, Administración y Estabilidad de Puerto Rico* (“PROMESA”),¹ presentó la [###] Objeción Colectiva (Sustantiva) de [Deudor] contra Reclamaciones por los cuales que no es responsable (la “Objeción Colectiva”) ante el Tribunal de Distrito de Estados Unidos para el Distrito de Puerto Rico (el “Tribunal”),² una copia de la cual se adjunta a esta notificación.

¹ La ley PROMESA está codificada en el título 48 del Código de los Estados Unidos (United States’ Code, U.S.C.) §§ 2101-2241.

² Los términos en mayúscula no definidos en el presente tendrán los significados que se les atribuye en la Objeción Colectiva.

RESUMEN

- **VERIFIQUE SI SUS RECLAMACIONES FIGURAN EN LA LISTA DEL ANEXO A A LA OBJECIÓN COLECTIVA.**
- Si su(s) reclamación(es) NO está(n) figurada(s) en la lista del Anexo A, esta(s) no se verán afectadas por la Objeción Colectiva, y usted NO necesita hacer nada.
- Si su(s) reclamación(es) figura(n) en la lista del Anexo A a la Objeción Colectiva, [Deudor] pretende que se desestime(n) su(s) reclamación(es) figuradas en el Anexo A porque, como se explica en la Objeción Colectiva adjunta, usted pretende recuperar un monto que [Deudor] no adeuda. La Objeción Colectiva presenta los fundamentos por los que [Deudor] considera que no es responsable.
- Las copias de la Objeción Colectiva y de las demás presentaciones en los Casos al amparo del Título III pueden consultarse gratis en línea en <https://cases.primeclerk.com/puertorico>.
- Si tiene preguntas, comuníquese con Prime Clerk al (844) 822-9231 (número gratuito para EE.UU. y Puerto Rico) o al (646) 486-7944 (para llamadas internacionales), disponible de 10:00 a.m. a 7:00 p.m. (Hora Estándar del Atlántico) (Disponible en español).

SI USTED NO RESPONDE DE CONFORMIDAD CON ESTA NOTIFICACIÓN, EL TRIBUNAL PODRÍA OTORGAR EL REMEDIO SOLICITADO POR LA OBJECIÓN COLECTIVA SIN MEDIAR NOTIFICACIÓN O AUDIENCIA POSTERIOR.

AVISO IMPORTANTE CONFORME A LA REGLA LOCAL 3007-1

Toda parte a quien se haya notificado esta Objeción Colectiva, o alguna otra parte de esta acción que cuestione la reparación aquí pretendida, debe notificar y presentar una respuesta a la Objeción Colectiva en la oficina del Secretario del Tribunal de Distrito de Estados Unidos para el Distrito de Puerto Rico antes de las **4:00 pm (Hora Estándar del Atlántico)** del [Fecha] a menos que el plazo sea prorrogado, por escrito, por [Deudor]. Si no se presenta la respuesta dentro del plazo aquí establecido, la Objeción Colectiva se considerará sin oposición y podrá ser otorgada a menos que: (1) la reparación solicitada estuviere prohibida por ley; (2) la reparación solicitada fuere contraria a la política pública, o (3) a juicio del Tribunal, se debiere actuar de otra forma en aras de la justicia. Si presenta una respuesta en tiempo y forma, el Tribunal podrá programar una audiencia.

Información fundamental para los Demandantes que opten por presentar una Respuesta

Quiénes están obligados a presentar una Respuesta. Cualquier parte que se oponga a la Objeción Colectiva deberá presentar una respuesta de conformidad con los procedimientos aquí establecidos. Si una parte cuya reclamación estuviere sujeta a la Objeción Colectiva no presenta ni notifica una respuesta en cumplimiento de los procedimientos descritos en el presente, el Tribunal podrá hacer lugar a la Objeción Colectiva con respecto a dicha reclamación, sin necesidad de cursar una notificación ulterior al demandante.

Quiénes NO están obligados a presentar una respuesta. Si usted no se opone a la desestimación total o parcial de su(s) reclamación(es) que se figuran en la lista del Anexo A a la Objeción Colectiva, entonces usted no necesita presentar una respuesta por escrito a la Objeción Colectiva y no es necesario que comparezca a la audiencia en que se tratará la Objeción Colectiva (que se describe a continuación). Además, la Objeción Colectiva solo se aplica a las reclamaciones que figuran en el Anexo A a la Objeción Colectiva, cuya copia puede consultarse de manera gratuita en línea, en <https://cases.primeclerk.com/puertorico>. No se requiere ninguna respuesta si su reclamación no aparece en la lista del Anexo A a la Objeción Colectiva.

Fecha límite para presentar una Respuesta. Su respuesta se considerará oportuna **solo si** es presentada ante el Tribunal **y** notificada antes de las **4:00 pm (Hora Estándar del Atlántico)** del **[Fecha]**, a menos que el plazo sea prorrogado, por escrito, por **[Deudor]** o cuando medie una solicitud por escrito ante el Tribunal y una resolución del Tribunal que prorroga la fecha límite.

La fecha límite para presentar y notificar una respuesta es las 4:00 pm (Hora estándar del Atlántico) del [Deudor].

Audiencia sobre la Objeción Colectiva. La respuesta correctamente presentada y notificada de acuerdo con este aviso dará lugar a la realización de una audiencia sobre la Objeción Colectiva y la respuesta a las **9.30 a.m. (Hora estándar del Atlántico) del [Fecha]**, ante la Honorable Jueza Laura Taylor Swain en el Tribunal de Distrito de Estados Unidos para el Distrito de Puerto Rico, ubicado en 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767. Si usted presenta una respuesta a la Objeción Colectiva, deberá entonces prepararse para comparecer en la audiencia sobre la Objeción Colectiva. **[Deudor]**, sin embargo, se reserva el derecho, con tres (3) días hábiles de antelación, de postergar la audiencia en la que se trate la Objeción Colectiva y la respuesta.

Los Deudores podrán presentar una contestación a su respuesta o responder mediante un alegato oral en la audiencia. Los Deudores podrán presentar su respuesta a más tardar siete (7) días calendario antes de la audiencia sobre la Objeción Colectiva y la respuesta.

EL TRIBUNAL SOLO TOMARÁ EN CONSIDERACIÓN SU RESPUESTA SI ESTA PRESENTADA Y NOTIFICADA ANTES O EN LA FECHA LÍMITE PARA PRESENTAR RESPUESTAS, DE CONFORMIDAD CON LAS INSTRUCCIONES INDICADAS EN ESTE AVISO.

Qué debe presentarse junto con una Respuesta. La respuesta a la Objeción Colectiva debe contener la siguiente información.

- (v) **Información de Contacto.** La respuesta debe incluir un **nombre, dirección, número de teléfono, y dirección de correo electrónico** del (1) reclamante que responde; (2) el abogado o representante designado del reclamante a quien los abogados de [Deudor] deben notificar una réplica a la respuesta, si la hubiere; o (3) la parte con facultades para conciliar, liquidar o de otro modo resolver la Objeción Colectiva en representación del reclamante.
- (vi) **Título.** La respuesta debe contener un título que indique el nombre del Tribunal, los nombres de los Deudores, el número de caso, el título de la Objeción Colectiva a la cual está dirigida la respuesta y el o los números de evidencias de reclamaciones relacionadas otorgados por Prime Clerk (que figuran en el Anexo A a la Objeción Colectiva y que están disponibles de forma gratuita en línea, en <https://cases.primeclerk.com/puertorico>).
- (vii) **La o las razones para oponerse a la Objeción Colectiva.** La respuesta debe contener una declaración concisa que indique las razones por las cuales el Tribunal no debería hacer lugar a la Objeción Colectiva con respecto a su Reclamación, incluidos los fundamentos fácticos y jurídicos que esgrimirá el demandante para oponerse a la Objeción Colectiva.
- (viii) **Documentación de Respaldo.** En la medida en que no se haya incluido ya en la evidencia de la reclamación, la respuesta debe incluir una copia de cualquier otra documentación o evidencia, con base en la cual el reclamante habrá de fundamentar su oposición a la Objeción Colectiva; con la salvedad, sin embargo, de que reclamante no estará obligado a revelar en la respuesta información confidencial, propia o de otro modo protegida; y con la salvedad, asimismo, de que el reclamante deberá revelar a [Deudor] toda la información y proporcionarle copias de todos los documentos que el reclamante considere confidenciales, propios o de otro modo protegidos, y en los cuales este tenga intención de basarse para fundamentar su reclamación, con sujeción a las limitaciones de confidencialidad que sean pertinentes.

Dónde y cómo presentar y notificar una Respuesta. Todas las respuestas deben presentarse de manera electrónica al Tribunal en el expediente *en el cual figure: Estado Libre Asociado de Puerto Rico*, No. de Caso 17 BK 3283-LTS. Existen dos métodos que usted puede emplear para presentar su respuesta:

3. **En línea.** Los usuarios registrados del sistema de archivo de casos del Tribunal deben presentar su respuesta de forma electrónica en formato PDF con opción de búsqueda.

4. **Por correo postal.** Si usted no es un abogado que sea usuario registrado del sistema de archivo de casos del Tribunal, puede presentar y notificar una respuesta mediante correo postal a la oficina del Secretario del Tribunal, el Comité de Supervisión y el Comité de Acreedores, a los siguientes domicilios:

Oficina del Secretario
Tribunal de Distrito de los Estados Unidos
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Abogado de la Junta de Supervisión
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036-8299
Atención: Martin J. Bienenstock
Brian S. Rosen

Abogado del Comité de Acreedores
Paul Hastings LLP
200 Park Avenue
New York, New York 10166
Atención: Luc A. Despins
G. Alexander Bongartz

SU RESPUESTA debe enviarse por correo postal para ser recibida en la oficina del Secretario, la Junta de Supervisión y el Comité de Acreedores a más tardar a las **4:00 p.m. (Hora Estándar del Atlántico)** del [Fecha], a menos que [Deudor] pospusiere esta fecha por escrito, o ante la solicitud escrita dirigida al Tribunal y la resolución de este que pospone la fecha límite.

Si usted no pudiere presentar y notificar una respuesta en línea o por correo postal como se indicó arriba, puede presentar la respuesta en persona en el domicilio que se indica a continuación, a más tardar a las **4:00 p.m. (Hora Estándar del Atlántico)** del [Fecha], a menos que [Deudor] pospusiere esta fecha por escrito, o ante la solicitud escrita dirigida al Tribunal y la resolución de este que pospone la fecha límite.

Oficina del Secretario
Tribunal de Distrito de los Estados Unidos
#150 Chardon Avenue
Federal Building
San Juan, Puerto Rico 00918

Su respuesta debe incluir un certificado de entrega que explique cómo se efectuó la notificación.

Si tiene cualquier pregunta sobre cómo presentar y notificar una respuesta, incluso preguntas sobre el sistema de archivo de casos del Tribunal, póngase en contacto con la **línea de ayuda de Prime Clerk** al **(844) 822-9231**.

Reserva de Derechos. NINGUNA PARTE DE ESTA OBJECIÓN COLECTIVA O NOTIFICACIÓN CONSTITUYE O HABRÁ DE INTERPRETARSE COMO UNA RENUNCIA A NINGUNO DE LOS DERECHOS DE [DEUDOR], O DE CUALQUIER OTRA PARTE INTERESADA EN ESTOS CASOS AL AMPARO DEL TÍTULO III, DE DISPUTAR RECLAMACIONES, FORMULAR RECONVENCIONES, RECLAMAR DERECHOS DE COMPENSACIÓN O REEMBOLSO, PRESENTAR DEFENSAS, OBJETAR RECLAMACIONES (U OTRAS RECLAMACIONES O CUESTIONES DE FONDO DE UN RECLAMANTE) CON CUALQUIER FUNDAMENTO NO EXPUESTO PREVIAMENTE EN UNA OBJECIÓN, A MENOS QUE EL TRIBUNAL HAYA DESESTIMADO LA RECLAMACIÓN O RESUELTO DE OTRA FORMA, O A SOLICITAR LA ESTIMACIÓN DE CUALQUIER RECLAMACIÓN EN UNA FECHA POSTERIOR. LAS PARTES AFECTADAS SERÁN DEBIDAMENTE NOTIFICADAS DE ELLO EN ESE MOMENTO.

Recursos Adicionales y a Quién Contactar para formular Preguntas

Todos los documentos presentados en los Casos iniciados al amparo del Título III, incluidas copias de las reclamaciones presentadas utilizando CM/ECF, se encuentran disponibles de forma gratuita en línea, en <https://cases.primeclerk.com/puertorico>. Este sitio web es mantenido por Prime Clerk y contiene una base de datos apta para búsquedas para ayudar a localizar documentos.

Si necesita obtener información adicional sobre la Objeción Colectiva, el estado de su respuesta, su reclamación o este aviso, póngase en contacto con la línea de ayuda de Prime Clerk llamando al **(844) 822-9231** (sin cargo para EE.UU. y Puerto Rico), o al **(646) 486-7944** (para llamadas internacionales), disponible desde las 10:00 a.m. hasta las 7:00 p.m. (Hora Estándar del Atlántico) (Disponible en español). Las consultas también pueden enviarse por correo electrónico a puertoricoinfo@primeclerk.com.

EXHIBIT 5

**English and Spanish Versions of the Form of Notice for Omnibus Objections based on the
Claim Being Incorrectly or Improperly Classified**

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

**NOTICE OF [###] OMNIBUS OBJECTION (SUBSTANTIVE) OF [DEBTOR] TO
MISCLASSIFIED CLAIMS**

IF YOUR CLAIM IS LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION, IT IS LISTED BECAUSE YOU HAVE FILED A PROOF OF CLAIM THAT IS INCORRECTLY OR IMPROPERLY CLASSIFIED AS A SECURED, UNSECURED, ADMINISTRATIVE, OR PRIORITY CLAIM.

THE OBJECTION SEEKS TO MODIFY YOUR CLAIM. YOUR CLAIM AS MODIFIED BY THE OBJECTION WILL BE PRESERVED FOR DETERMINATION AT A LATER DATE AND YOU WILL RECEIVE NOTICE OF ANY FURTHER PROCEEDINGS.

IF YOUR CLAIM IS LISTED ON EXHIBIT A, YOU SHOULD READ THIS NOTICE AND THE OMNIBUS OBJECTION CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

PLEASE TAKE NOTICE THAT, on [Date], the [Debtor], by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as [Debtor]’s representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),¹ filed the *[###] Omnibus Objection of [Debtor] (Substantive) to Misclassified Claims* (the “Omnibus Objection”) with the United States District Court for the District of Puerto Rico (the “Court”),² a copy of which is attached to this notice.

¹ PROMESA is codified at 48 U.S.C. §§ 2101-2241.

² Capitalized terms used but not defined herein shall have the meanings set forth in the Omnibus Objection.

OVERVIEW

- PLEASE CHECK IF YOUR CLAIM(S) IS/ARE LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION.
- If your claim(s) is/are NOT listed on Exhibit A, your claim(s) will not be affected by the Omnibus Objection, and you DO NOT have to do anything.
- If your claim(s) is/are listed on Exhibit A to the Omnibus Objection, [Debtor] is seeking to disallow your claim(s) listed on Exhibit A because, as explained in the accompanying Omnibus Objection, your claim(s) is/are incorrectly or improperly classified as a secured or priority claim.
- **Modification of your claim(s) may seek to alter your rights, as set forth in the Omnibus Objection. Your claim(s) will be preserved as modified by the Omnibus Objection and you will continue to receive notice of any further proceedings.**
- Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>.
- **If you have questions, please contact Prime Clerk at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).**

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OMNIBUS OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

IMPORTANT NOTICE PURSUANT TO LOCAL RULE 3007-1

Any party against whom this Omnibus Objection has been served, or any other party to the action who objects to the relief sought herein, shall serve and file a response to the Omnibus Objection with the clerk's office of the United States District Court for the District of Puerto Rico by **4:00 pm (Atlantic Standard Time)** on [Date] unless otherwise extended, in writing, by [Debtor]. If no response is filed within the time allowed herein, the Omnibus Objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the Court may schedule a hearing.

Critical Information for Claimants Choosing to File a Response

Who is Required to File a Response. Any party who disputes the Omnibus Objection is required to file a response in accordance with the procedures set forth herein. If a party whose claim is subject to the Omnibus Objection does not file and serve a response in compliance with the procedures herein, the Court may grant the Omnibus Objection with respect to such claim without further notice to the claimant.

Who is NOT Required to File a Response. If you do not oppose the modification of your claim(s) that are listed on the column titled “Claims to be Modified” of Exhibit A to the Omnibus Objection, then you do not need to file a written response to the Omnibus Objection and you do not need to appear at the hearing on the Omnibus Objection (described below). Additionally, the Omnibus Objection only applies to the claims listed on Exhibit A to the Omnibus Objection, a copy of which is available free online at <https://cases.primeclerk.com/puertorico>. No response is required if your claim is not listed on Exhibit A to the Omnibus Objection.

Deadline for Filing a Response. Your response will be deemed timely only if it is filed with the Court and served by **4:00 pm (Atlantic Standard Time)** on **[Date]**, unless otherwise extended, in writing, by [Debtor] or upon written request to the Court and order of the Court extending the deadline.

**The deadline for filing and serving a response is
4:00 pm (Atlantic Standard Time) on [Debtor].**

Hearing on the Omnibus Objection. If a response is properly filed and served in accordance with this notice, a hearing on the Omnibus Objection and the response will be held at **9:30 a.m. (Atlantic Standard Time) on [Date]**, before The Honorable Laura Taylor Swain at the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767. If you file a response to the Omnibus Objection, then you should plan to appear at the hearing on the Omnibus Objection. [Debtor], however, reserves the right, on three (3) business days’ notice, to adjourn the hearing with respect to the Omnibus Objection and the response.

The Debtors may file a reply to your response or reply in oral argument at the hearing. The Debtors are permitted to file their reply no later than seven (7) calendar days before the hearing on the Omnibus Objection and the response.

THE COURT WILL ONLY CONSIDER YOUR RESPONSE IF YOUR RESPONSE IS FILED AND SERVED BY THE RESPONSE DEADLINE IN ACCORDANCE WITH THE INSTRUCTIONS SET FORTH IN THIS NOTICE.

What to File with a Response. Your response to the Omnibus Objection must contain the following information.

- (i) **Contact Information.** The response must include a **name, address, telephone number, and email address** of either (1) the responding claimant; (2) the claimant’s attorney or designated representative to whom the attorneys for [Debtor] should serve a reply to the response, if any; or (3) the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the claimant’s behalf.
- (ii) **Caption.** The response must contain a caption stating the name of the Court, the

names of the Debtors, the case number, the title of the Omnibus Objection to which the response is directed, and the proof of claim number(s) related thereto from Prime Clerk (which are listed on Exhibit A to the Omnibus Objection and available free online at <https://cases.primeclerk.com/puertorico>).

- (iii) **Reason(s) for Opposing the Omnibus Objection.** The response must contain a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection.
- (iv) **Supporting Documentation.** To the extent not already included with the proof of claim, the response should include a copy of any other documentation or other evidence of the claim, upon which the claimant will rely in opposing the Omnibus Objection; provided, however, that the claimant need not disclose confidential, proprietary, or otherwise protected information in the response; and provided, further, that the claimant shall disclose to Debtor all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints.

Where and How to File and Serve a Response. Every response should be filed electronically with the Court on the docket of *In re Commonwealth of Puerto Rico*, Case No. 17 BK 3283-LTS. There are two methods that you can use to file your response:

1. **Online.** Registered users of the Court's case filing system must file their response electronically in searchable portable document format.
2. **By Mail.** If you are not an attorney who is a registered user of the Court's case filing system, you may file and serve a response by mailing it to the Court's Clerk's office, the Oversight Board, and the Creditors' Committee at the following addresses:

Clerk's Office
United States District Court
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Counsel for the Oversight Board
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036-8299
Attn: Martin J. Bienenstock
Brian S. Rosen

Counsel for the Creditors' Committee
Paul Hastings LLP
200 Park Avenue
New York, New York 10166
Attn: Luc A. Despins
G. Alexander Bongartz

YOUR RESPONSE must be mailed so as to be received by the Clerk's Office, the Oversight Board, and the Creditors' Committee no later than **4:00 pm (Atlantic Standard Time)** on **[Date]**, unless otherwise extended by [Debtor], in writing, or upon a written request to the Court and order of the Court extending the deadline.

In the event that you are unable to file and serve a response online or by mail as specified above, you may file a response in person at the following address by no later than **4:00 pm (Atlantic Standard Time)** on **[Date]**, unless otherwise extended by [Debtor], in writing, or upon a written request to the Court and order of the Court extending the deadline:

Clerk's Office
United States District Court
#150 Chardon Avenue
Federal Building
San Juan, Puerto Rico 00918

A certificate of service should be included with your response explaining how service was accomplished.

If you have any questions about filing and serving a response, including questions about the Court's case filing system, please contact the **Prime Clerk hotline at (844) 822-9231**.

Reservation of Rights. NOTHING IN THE OMNIBUS OBJECTION OR THIS NOTICE IS OR SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF [DEBTOR] OR ANY OTHER PARTY IN INTEREST IN THE TITLE III CASES TO DISPUTE ANY CLAIMS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, OR DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE NOTICE THEREOF AT SUCH TIME.

Additional Resources and Who to Contact with Questions

All documents filed in the Title III Cases, including copies of claims filed using CM/ECF, are available free online at <https://cases.primeclerk.com/puertorico>. This website is maintained by Prime Clerk and includes a searchable database to assist with locating documents.

If you require additional information regarding the Omnibus Objection, the status of your response, your claim, or this notice, please contact the Prime Clerk hotline at **(844) 822-9231** (toll free for U.S. and Puerto Rico) or **(646) 486-7944** (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available). Inquiries may also be sent via email to puertoricoinfo@primeclerk.com.

ANEXO 5

**Versiones en inglés y en español del Formulario de Notificación de Objeciones Colectivas
contra Reclamaciones clasificadas erróneamente**

**TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS
PARA EL DISTRITO DE PUERTO RICO**

En el caso:

LA JUNTA DE SUPERVISIÓN Y
ADMINISTRACIÓN FINANCIERA PARA PUERTO
RICO,

como representante del

ESTADO LIBRE ASOCIADO DE PUERTO RICO, *y otros*,

Deudores.

PROMESA
Título III

Nº 17 BK 3283-LTS
(Administrados en forma conjunta)

**NOTIFICACIÓN DE LA [###] OBJECIÓN COLECTIVA (SUBSTANTIVA) DE
[DEUDOR] CONTRA LAS RECLAMACIONES CLASIFICADAS ERRÓNEAMENTE**

SI SU RECLAMACIÓN SE FIGURA EN EL ANEXO A A LA OBJECIÓN COLECTIVA, ESTO OBEDECE A QUE USTED HA PRESENTADO UNA EVIDENCIA DE RECLAMACIÓN CLASIFICADA DE FORMA INCORRECTA O INADECUADA, COMO UNA RECLAMACIÓN CON GARANTÍA, SIN GARANTÍA, ADMINISTRATIVA O CON DERECHO DE PRELACIÓN.

LA OBJECIÓN PRETENDE MODIFICAR SU RECLAMACIÓN. SU RECLAMACIÓN MODIFICADA POR LA OBJECIÓN QUEDARÁ PRESERVADA PARA SER DETERMINADA EN UNA FECHA POSTERIOR Y USTED RECIBIRÁ UNA NOTIFICACIÓN SOBRE OTROS PROCEDIMIENTOS.

SI SU RECLAMACIÓN SE ENCUENTRA EN LA LISTA DEL ANEXO A, USTED DEBE LEER ESTA NOTIFICACIÓN Y LA OBJECIÓN COLECTIVA CUIDADOSAMENTE Y ANALIZARLA CON SU ABOGADO. SI NO TIENE UN ABOGADO, LE RECOMENDAMOS QUE CONSULTE A UNO.

QUEDA INFORMADO de que, el[Fecha], [Deudor], por intermedio de la Junta de Supervisión y Administración Financiera para Puerto Rico (la “Junta de Supervisión”), en carácter de representante de [Deudor] conforme a la sección 315(b) de la *Ley de Supervisión, Administración y Estabilidad de Puerto Rico* (“PROMESA”),¹ presentó la [###] *Objeción Colectiva (Sustantiva) de [Deudor] contra Reclamaciones clasificadas erróneamente* (la

¹ La ley PROMESA está codificada en el título 48 del Código de los Estados Unidos (United States’ Code, U.S.C.) §§ 2101-2241.

“Objeción Colectiva”) ante el Tribunal de Distrito de Estados Unidos para el Distrito de Puerto Rico (el “Tribunal”),² una copia de la cual se adjunta a esta notificación.

RESUMEN

- **VERIFIQUE SI SUS RECLAMACIONES FIGURAN EN LA LISTA DEL ANEXO A A LA OBJECIÓN COLECTIVA.**
- Si su(s) reclamación(es) NO está(n) figurada(s) en la lista del Anexo A, esta(s) no se verán afectadas por la Objeción Colectiva, y usted NO necesita hacer nada.
- Si su(s) reclamación(es) figura(n) en la lista del Anexo A a la Objeción Colectiva, [Deudor] pretende que se desestime(n) su(s) reclamación(es) figuradas en el Anexo A porque, como se explica en la Objeción Colectiva adjunta, su(s) reclamación(es) está(n) incorrectamente o inadecuadamente clasificadas como reclamación garantizada o con derecho de prelación.
- **La modificación de su(s) reclamación(es) pueden procurar modificar sus derechos, como se indica en la Objeción Colectiva. Su(s) reclamación(es) se preservará(n) tal como fueron modificadas por la Objeción Colectiva y usted continuará recibiendo notificaciones sobre otros procedimientos.**
- Las copias de la Objeción Colectiva y de las demás presentaciones en los Casos al amparo del Título III están disponibles de forma gratuita en línea en <https://cases.primeclerk.com/puertorico>.
- **Si tiene preguntas, comuníquese con Prime Clerk al (844) 822-9231 (número gratuito para EE.UU. y Puerto Rico) o al (646) 486-7944 (para llamadas internacionales), disponible de 10:00 a.m. a 7:00 p.m. (Hora Estándar del Atlántico) (Disponible en español).**

SI USTED NO RESPONDE DE CONFORMIDAD CON ESTA NOTIFICACIÓN, EL TRIBUNAL PODRÍA OTORGAR EL REMEDIO SOLICITADO POR LA OBJECIÓN COLECTIVA SIN MEDIAR NOTIFICACIÓN O AUDIENCIA POSTERIOR.

² Los términos en mayúscula no definidos en el presente tendrán los significados que se les atribuye en la Objeción Colectiva.

AVISO IMPORTANTE CONFORME A LA REGLA LOCAL 3007-1

Toda parte a quien se haya notificado esta Objeción Colectiva, o alguna otra parte de esta acción que cuestione la reparación aquí pretendida, debe notificar y presentar una respuesta a la Objeción Colectiva en la oficina del Secretario del Tribunal de Distrito de Estados Unidos para el Distrito de Puerto Rico antes de las **4:00 pm (Hora Estándar del Atlántico)** del **[Fecha]** a menos que el plazo sea prorrogado, por escrito, por **[Deudor]**. Si no se presenta la respuesta dentro del plazo aquí establecido, la Objeción Colectiva se considerará sin oposición y podrá ser otorgada a menos que: (1) la reparación solicitada estuviere prohibida por ley; (2) la reparación solicitada fuere contraria a la política pública, o (3) a juicio del Tribunal, se debiere actuar de otra forma en aras de la justicia. Si presenta una respuesta en tiempo y forma, el Tribunal podrá programar una audiencia.

Información fundamental para los Demandantes que opten por presentar una Respuesta

Quiénes están obligados a presentar una Respuesta. Cualquier parte que se oponga a la Objeción Colectiva deberá presentar una respuesta de conformidad con los procedimientos aquí establecidos. Si una parte cuya reclamación estuviere sujeta a la Objeción Colectiva no presenta ni notifica una respuesta en cumplimiento de los procedimientos descritos en el presente, el Tribunal podrá hacer lugar a la Objeción Colectiva con respecto a dicha reclamación, sin necesidad de cursar una notificación ulterior al demandante.

Quiénes NO están obligados a presentar una respuesta. Si usted no se opone a las modificaciones de su(s) reclamación(es) que se figuran en la columna titulada “Reclamaciones a ser modificadas” del Anexo A a la Objeción Colectiva, entonces no es necesario que presente una respuesta por escrito a la Objeción Colectiva ni que comparezca a la audiencia en la que vaya a tratarse la Objeción Colectiva (que se describe a continuación). Además, la Objeción Colectiva solo se aplica a las reclamaciones que figuran en el Anexo A a la Objeción Colectiva, cuya copia puede consultarse de manera gratuita en línea, en <https://cases.primeclerk.com/puertorico>. No se requiere ninguna respuesta si su reclamación no figura en la lista del Anexo A a la Objeción Colectiva.

Fecha límite para presentar una Respuesta. Su respuesta se considerará oportuna **solo si** es presentada ante el Tribunal **y** notificada antes de las **4:00 pm (Hora Estándar del Atlántico)** del **[Fecha]**, a menos que el plazo sea prorrogado, por escrito, por **[Deudor]** o cuando medie una solicitud por escrito ante el Tribunal y una resolución del Tribunal que prorroga la fecha límite.

La fecha límite para presentar y notificar una respuesta es las 4:00 pm (Hora estándar del Atlántico) del [Deudor].

Audiencia sobre la Objeción Colectiva. La respuesta correctamente presentada y notificada de acuerdo con este aviso dará lugar a la realización de una audiencia sobre la Objeción Colectiva y la respuesta a las **9.30 a.m. (Hora estándar del Atlántico)** del **[Fecha]**,

ante la Honorable Jueza Laura Taylor Swain en el Tribunal de Distrito de Estados Unidos para el Distrito de Puerto Rico, ubicado en 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767. Si usted presenta una respuesta a la Objeción Colectiva, deberá entonces prepararse para comparecer en la audiencia sobre la Objeción Colectiva. [Deudor], sin embargo, se reserva el derecho, con tres (3) días hábiles de antelación, de postergar la audiencia en la que se trate la Objeción Colectiva y la respuesta.

Los Deudores podrán presentar una contestación a su respuesta o responder mediante un alegato oral en la audiencia. Los Deudores podrán presentar su respuesta a más tardar siete (7) días calendario antes de la audiencia sobre la Objeción Colectiva y la respuesta.

EL TRIBUNAL SOLO TOMARÁ EN CONSIDERACIÓN SU RESPUESTA SI ESTA PRESENTADA Y NOTIFICADA ANTES O EN LA FECHA LÍMITE PARA PRESENTAR RESPUESTAS, DE CONFORMIDAD CON LAS INSTRUCCIONES INDICADAS EN ESTE AVISO.

Qué debe presentarse junto con una Respuesta. La respuesta a la Objeción Colectiva debe contener la siguiente información.

- (v) **Información de Contacto.** La respuesta debe incluir un **nombre, dirección, número de teléfono, y dirección de correo electrónico** del (1) reclamante que responde; (2) el abogado o representante designado del reclamante a quien los abogados de [Deudor] deben notificar una réplica a la respuesta, si la hubiere; o (3) la parte con facultades para conciliar, liquidar o de otro modo resolver la Objeción Colectiva en representación del reclamante.
- (vi) **Título.** La respuesta debe contener un título que indique el nombre del Tribunal, los nombres de los Deudores, el número de caso, el título de la Objeción Colectiva a la cual está dirigida la respuesta y el o los números de evidencias de reclamaciones relacionadas otorgados por Prime Clerk (que figuran en el Anexo A a la Objeción Colectiva y que están disponibles de forma gratuita en línea, en <https://cases.primeclerk.com/puertorico>).
- (vii) **La o las razones de la oposición a la Objeción Colectiva.** La respuesta debe contener una declaración concisa que indique las razones por las cuales el Tribunal no debería hacer lugar a la Objeción Colectiva con respecto a su Reclamación, incluidos los fundamentos fácticos y jurídicos que esgrimirá el demandante para oponerse a la Objeción Colectiva.
- (viii) **Documentación de Respaldo.** En la medida en que no se haya incluido ya en la evidencia de la reclamación, la respuesta debe incluir una copia de cualquier otra documentación o evidencia, con base en la cual el reclamante habrá de fundamentar su oposición a la Objeción Colectiva; con la salvedad, sin embargo, de que el reclamante no estará obligado a revelar en la respuesta información confidencial, propia o de otro modo protegida; y con la salvedad, asimismo, de que el reclamante deberá revelar al Deudor toda la información y proporcionarle copias de todos los documentos que el reclamante considere confidenciales, propios o de otro modo protegidos, y en los cuales este tenga intención de basarse para fundamentar su

reclamación, con sujeción a las limitaciones de confidencialidad que sean pertinentes.

Dónde y cómo presentar y notificar una Respuesta. Todas las respuestas deben presentarse de manera electrónica al Tribunal en el expediente *en el cual figure: Estado Libre Asociado de Puerto Rico*, No. de Caso 17 BK 3283-LTS. Existen dos métodos que usted puede emplear para presentar su respuesta:

3. **En línea.** Los usuarios registrados del sistema de archivo de casos del Tribunal deben presentar su respuesta de forma electrónica en formato PDF con opción de búsqueda.
4. **Por correo postal.** Si usted no es un abogado que sea usuario registrado del sistema de archivo de casos del Tribunal, puede presentar y notificar una respuesta mediante correo postal a la oficina del Secretario del Tribunal, el Comité de Supervisión y el Comité de Acreedores, a los siguientes domicilios:

Oficina del Secretario
Tribunal de Distrito de los Estados Unidos
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Abogado de la Junta de Supervisión
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036-8299
Atención: Martin J. Bienenstock
Brian S. Rosen

Abogado del Comité de Acreedores
Paul Hastings LLP
200 Park Avenue
New York, New York 10166
Atención: Luc A. Despins
G. Alexander Bongartz

SU RESPUESTA debe ser enviada por correo postal para ser recibida en la oficina del Secretario, la Junta de Supervisión y el Comité de Acreedores a más tardar a las **4:00 p.m. (Hora Estándar del Atlántico)** del **[Fecha]**, a menos que [Deudor] pospusiere esta fecha por escrito, o ante la solicitud escrita dirigida al Tribunal y la resolución de este que pospone la fecha límite.

Si usted no pudiere presentar y notificar una respuesta en línea o por correo postal como se indicó arriba, puede presentar la respuesta en persona en el domicilio que se indica a continuación, a más tardar a las **4:00 p.m. (Hora Estándar del Atlántico)** del **[Fecha]**, a menos que [Deudor] pospusiere esta fecha por escrito, o ante la solicitud escrita dirigida al Tribunal y la resolución de este que pospone la fecha límite.

Oficina del Secretario
Tribunal de Distrito de los Estados Unidos
#150 Chardon Avenue
Federal Building
San Juan, Puerto Rico 00918

Su respuesta debe incluir un certificado de entrega que explique cómo se efectuó la notificación.

Si tiene cualquier pregunta sobre cómo presentar y notificar una respuesta, incluso preguntas sobre el sistema de archivo de casos del Tribunal, póngase en contacto con **la línea de ayuda de Prime Clerk** al **(844) 822-9231**.

Reserva de Derechos. NINGUNA PARTE DE ESTA OBJECIÓN COLECTIVA O NOTIFICACIÓN CONSTITUYE O HABRÁ DE INTERPRETARSE COMO UNA RENUNCIA A NINGUNO DE LOS DERECHOS DE [DEUDOR], O DE CUALQUIER OTRA PARTE INTERESADA EN ESTOS CASOS AL AMPARO DEL TÍTULO III, DE DISPUTAR RECLAMACIONES, FORMULAR RECONVENCIONES, RECLAMAR DERECHOS DE COMPENSACIÓN O REEMBOLSO, PRESENTAR DEFENSAS, OBJETAR RECLAMACIONES (U OTRAS RECLAMACIONES O CUESTIONES DE FONDO DE UN RECLAMANTE) CON CUALQUIER FUNDAMENTO NO EXPUESTO PREVIAMENTE EN UNA OBJECIÓN, A MENOS QUE EL TRIBUNAL HAYA DESESTIMADO LA RECLAMACIÓN O RESUELTO DE OTRA FORMA, O A SOLICITAR LA ESTIMACIÓN DE CUALQUIER RECLAMACIÓN EN UNA FECHA POSTERIOR. LAS PARTES AFECTADAS SERÁN DEBIDAMENTE NOTIFICADAS DE ELLO EN ESE MOMENTO.

Recursos Adicionales y a Quién Contactar para formular Preguntas

Todos los documentos presentados en los Casos iniciados al amparo del Título III, incluidas copias de las reclamaciones presentadas utilizando CM/ECF, se encuentran disponibles de forma gratuita en línea, en <https://cases.primeclerk.com/puertorico>. Este sitio web es mantenido por Prime Clerk y contiene una base de datos apta para búsquedas para ayudar a localizar documentos.

Si necesita obtener información adicional sobre la Objeción Colectiva, el estado de su respuesta, su reclamación o este aviso, póngase en contacto con la línea de ayuda de Prime Clerk llamando al **(844) 822-9231** (sin cargo para EE.UU. y Puerto Rico), o al **(646) 486-7944** (para llamadas internacionales), disponible desde las 10:00 a.m. hasta las 7:00 p.m. (Hora Estándar del Atlántico) (Disponible en español). Las consultas también pueden enviarse por correo electrónico a puertoricoinfo@primeclerk.com.

EXHIBIT 6

**English and Spanish Versions of the Form of Notice for Omnibus Objections based on the
Claim being Filed against Non-Debtors**

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

**NOTICE OF [###] OMNIBUS OBJECTION (SUBSTANTIVE) OF [DEBTOR] TO
CLAIMS AGAINST NON-DEBTORS**

**IF YOUR CLAIM IS LISTED ON EXHIBIT A, [DEBTOR] IS SEEKING TO
DISALLOW YOUR CLAIM IN WHOLE OR IN PART BECAUSE IT WAS NOT
ASSERTED AGAINST [DEBTOR] OR ANY OF THE OTHER TITLE III DEBTORS.**

**PLEASE CONFIRM WHETHER YOUR CLAIM IS LISTED ON EXHIBIT A TO THE
OMNIBUS OBJECTION. THE OMNIBUS OBJECTION ONLY SEEKS TO ALTER
YOUR RIGHTS IF YOUR CLAIM IS LISTED ON EXHIBIT A TO THE OMNIBUS
OBJECTION. ANY CLAIM THAT IS DISALLOWED WILL BE TREATED AS
THOUGH IT WERE NEVER FILED.**

**IF YOUR CLAIM IS LISTED ON EXHIBIT A, YOU SHOULD READ THIS NOTICE
AND THE OMNIBUS OBJECTION CAREFULLY AND DISCUSS IT WITH YOUR
ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO
CONSULT ONE.**

PLEASE TAKE NOTICE THAT, on [Date], the [Debtor], by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as [Debtor]’s representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),¹ filed the *[###] Omnibus Objection of [Debtor] (Substantive) to Claims Against Non-Debtors* (the “Omnibus Objection”) with the United States District Court for the District of Puerto Rico (the “Court”),² a copy of which is attached to this notice.

¹ PROMESA is codified at 48 U.S.C. §§ 2101-2241.

² Capitalized terms used but not defined herein shall have the meanings set forth in the Omnibus Objection.

OVERVIEW

- PLEASE CHECK IF YOUR CLAIM(S) IS/ARE LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION.
- If your claim(s) is/are NOT listed on Exhibit A, your claim(s) will not be affected by the Omnibus Objection, and you DO NOT have to do anything.
- If your claim(s) is/are listed on Exhibit A to the Omnibus Objection, [Debtor] is seeking to disallow your claim(s) listed on Exhibit A because, as explained in the accompanying Omnibus Objection, your claim(s) is/are filed against an entity or entities that are not a Debtor in the Title III proceedings.
- Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>.
- If you have questions, please contact Prime Clerk at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OMNIBUS OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

IMPORTANT NOTICE PURSUANT TO LOCAL RULE 3007-1

Any party against whom this Omnibus Objection has been served, or any other party to the action who objects to the relief sought herein, shall serve and file a response to the Omnibus Objection with the clerk's office of the United States District Court for the District of Puerto Rico by **4:00 pm (Atlantic Standard Time)** on [Date] unless otherwise extended, in writing, by [Debtor]. If no response is filed within the time allowed herein, the Omnibus Objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the Court may schedule a hearing.

Critical Information for Claimants Choosing to File a Response

Who is Required to File a Response. Any party who disputes the Omnibus Objection is required to file a response in accordance with the procedures set forth herein. If a party whose claim is subject to the Omnibus Objection does not file and serve a response in compliance with the procedures herein, the Court may grant the Omnibus Objection with respect to such claim without further notice to the claimant.

Who is NOT Required to File a Response. If you do not oppose the disallowance in whole or in part of your claim(s) that are listed on Exhibit A to the Omnibus Objection, then you

do not need to file a written response to the Omnibus Objection and you do not need to appear at the hearing on the Omnibus Objection (described below). Additionally, the Omnibus Objection only applies to the claims listed on Exhibit A to the Omnibus Objection, a copy of which is available free online at <https://cases.primeclerk.com/puertorico>. No response is required if your claim is not listed on Exhibit A to the Omnibus Objection.

Deadline for Filing a Response. Your response will be deemed timely **only if** it is filed with the Court **and** served by **4:00 pm (Atlantic Standard Time)** on **[Date]**, unless otherwise extended, in writing, by [Debtor] or upon written request to the Court and order of the Court extending the deadline.

**The deadline for filing and serving a response is
4:00 pm (Atlantic Standard Time) on [Debtor].**

Hearing on the Omnibus Objection. If a response is properly filed and served in accordance with this notice, a hearing on the Omnibus Objection and the response will be held at **9:30 a.m. (Atlantic Standard Time) on [Date]**, before The Honorable Laura Taylor Swain at the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767. If you file a response to the Omnibus Objection, then you should plan to appear at the hearing on the Omnibus Objection. [Debtor], however, reserves the right, on three (3) business days' notice, to adjourn the hearing with respect to the Omnibus Objection and the response.

The Debtors may file a reply to your response or reply in oral argument at the hearing. The Debtors are permitted to file their reply no later than seven (7) calendar days before the hearing on the Omnibus Objection and the response.

**THE COURT WILL ONLY CONSIDER YOUR RESPONSE IF YOUR RESPONSE IS
FILED AND SERVED BY THE RESPONSE DEADLINE IN ACCORDANCE WITH
THE INSTRUCTIONS SET FORTH IN THIS NOTICE.**

What to File with a Response. Your response to the Omnibus Objection must contain the following information.

- (i) **Contact Information.** The response must include a **name, address, telephone number,** and **email address** of either (1) the responding claimant; (2) the claimant's attorney or designated representative to whom the attorneys for [Debtor] should serve a reply to the response, if any; or (3) the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the claimant's behalf.
- (ii) **Caption.** The response must contain a caption stating the name of the Court, the names of the Debtors, the case number, the title of the Omnibus Objection to which the response is directed, and the proof of claim number(s) related thereto from Prime Clerk (which are listed on Exhibit A to the Omnibus Objection and available free online at <https://cases.primeclerk.com/puertorico>).

- (iii) **Reason(s) for Opposing the Omnibus Objection.** The response must contain a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection.
- (iv) **Supporting Documentation.** To the extent not already included with the proof of claim, the response should include a copy of any other documentation or other evidence of the claim, upon which the claimant will rely in opposing the Omnibus Objection; provided, however, that the claimant need not disclose confidential, proprietary, or otherwise protected information in the response; and provided, further, that the claimant shall disclose to Debtor all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints.

Where and How to File and Serve a Response. Every response should be filed electronically with the Court on the docket of *In re Commonwealth of Puerto Rico*, Case No. 17 BK 3283-LTS. There are two methods that you can use to file your response:

1. **Online.** Registered users of the Court's case filing system must file their response electronically in searchable portable document format.
2. **By Mail.** If you are not an attorney who is a registered user of the Court's case filing system, you may file and serve a response by mailing it to the Court's Clerk's office, the Oversight Board, and the Creditors' Committee at the following addresses:

Clerk's Office
United States District Court
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Counsel for the Oversight Board
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036-8299
Attn: Martin J. Bienenstock
Brian Rosen

Counsel for the Creditors' Committee
Paul Hastings LLP
200 Park Avenue
New York, New York 10166
Attn: Luc A. Despins
G. Alexander Bongartz

YOUR RESPONSE must be mailed so as to be received by the Clerk's Office, the Oversight Board, and the Creditors' Committee no later than **4:00 pm (Atlantic Standard Time)** on **[Date]**, unless otherwise extended by [Debtor], in writing, or upon a written request to the

Court and order of the Court extending the deadline.

In the event that you are unable to file and serve a response online or by mail as specified above, you may file a response in person at the following address by no later than **4:00 pm (Atlantic Standard Time)** on [Date], unless otherwise extended by [Debtor], in writing, or upon a written request to the Court and order of the Court extending the deadline:

Clerk's Office
United States District Court
#150 Chardon Avenue
Federal Building
San Juan, Puerto Rico 00918

A certificate of service should be included with your response explaining how service was accomplished.

If you have any questions about filing and serving a response, including questions about the Court's case filing system, please contact the **Prime Clerk hotline at (844) 822-9231**.

Reservation of Rights. NOTHING IN THE OMNIBUS OBJECTION OR THIS NOTICE IS OR SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF [DEBTOR] OR ANY OTHER PARTY IN INTEREST IN THE TITLE III CASES TO DISPUTE ANY CLAIMS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, OR DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE NOTICE THEREOF AT SUCH TIME.

Additional Resources and Who to Contact with Questions

All documents filed in the Title III Cases, including copies of claims filed using CM/ECF, are available free online at <https://cases.primeclerk.com/puertorico>. This website is maintained by Prime Clerk and includes a searchable database to assist with locating documents.

If you require additional information regarding the Omnibus Objection, the status of your response, your claim, or this notice, please contact the Prime Clerk hotline at **(844) 822-9231** (toll free for U.S. and Puerto Rico) or **(646) 486-7944** (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available). Inquiries may also be sent via email to puertoricoinfo@primeclerk.com.

ANEXO 6

**Versiones en inglés y en español del Formulario de Notificación de Objeciones Colectivas
contra Reclamaciones presentadas contra quienes no son deudores**

**TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS
PARA EL DISTRITO DE PUERTO RICO**

En el caso:

LA JUNTA DE SUPERVISIÓN Y
ADMINISTRACIÓN FINANCIERA PARA PUERTO
RICO,

como representante del

ESTADO LIBRE ASOCIADO DE PUERTO RICO, *y otros*,

Deudores.

PROMESA

Título III

Nº 17 BK 3283-LTS

(Administrados en forma conjunta)

**NOTIFICACIÓN DE LA [###] OBJECIÓN COLECTIVA (SUBSTANTIVA) DE
[DEUDOR] CONTRA RECLAMACIONES PRESENTADAS CONTRA QUIENES NO
SON DEUDORES**

SI SU RECLAMACIÓN SE FIGURAN EN LA LISTA DEL ANEXO A, [DEUDOR] PRETENDE QUE SE DESESTIME SU RECLAMACIÓN TOTAL O PARCIALMENTE PORQUE NO SE PRESENTÓ CONTRA [DEUDOR] O ALGÚN OTRO DEUDOR AL AMPARO DEL TÍTULO III.

CONFIRME SI SU RECLAMACIÓN SE FIGURAN EN LA LISTA DEL ANEXO A A ESTA OBJECIÓN COLECTIVA. LA OBJECIÓN COLECTIVA SOLO PRETENDE MODIFICAR SUS DERECHOS SI SU RECLAMACIÓN SE FIGURAN EN LA LISTA DEL ANEXO A A LA OBJECIÓN COLECTIVA. CUALQUIER RECLAMACIÓN QUE SEA DESESTIMADA SE CONSIDERARÁ COMO SI NUNCA SE HUBIESE PRESENTADO.

SI SU RECLAMACIÓN SE ENCUENTRA EN LA LISTA DEL ANEXO A, USTED DEBE LEER ESTA NOTIFICACIÓN Y LA OBJECIÓN COLECTIVA CUIDADOSAMENTE Y ANALIZARLA CON SU ABOGADO. SI NO TIENE UN ABOGADO, LE RECOMENDAMOS QUE CONSULTE A UNO.

QUEDA INFORMADO de que, el[Fecha], [Deudor], por intermedio de la Junta de Supervisión y Administración Financiera para Puerto Rico (la “Junta de Supervisión”), en carácter de representante de [Deudor] conforme a la sección 315(b) de la *Ley de Supervisión, Administración y Estabilidad de Puerto Rico* (“PROMESA”),¹ presentó la [###] Objeción Colectiva (Sustantiva) de [Deudor] contra Reclamaciones formuladas contra quienes no son

¹ La ley PROMESA está codificada en el título 48 del Código de los Estados Unidos (United States’ Code, U.S.C.) §§ 2101-2241.

deudores (la “Objeción Colectiva”) ante el Tribunal de Distrito de Estados Unidos para el Distrito de Puerto Rico (el “Tribunal”),² una copia de la cual se adjunta a esta notificación.

RESUMEN

- **VERIFIQUE SI SUS RECLAMACIONES FIGURAN EN LA LISTA DEL ANEXO A A LA OBJECIÓN COLECTIVA.**
- Si su(s) reclamación(es) NO está(n) figurada(s) en la lista del Anexo A, esta(s) no se verán afectadas por la Objeción Colectiva, y usted NO necesita hacer nada.
- Si su(s) reclamación(es) figura(n) en la lista del Anexo A a la Objeción Colectiva, [Deudor] pretende que se desestime(n) su(s) reclamación(es) figurada(s) en el Anexo A porque, como se explica en la Objeción Colectiva adjunta, su(s) reclamación(es) se ha(n) presentado contra una entidad o entidades que no son un Deudor en la causa que tramita al amparo del Título III.
- Las copias de la Objeción Colectiva y de las demás presentaciones en los Casos al amparo del Título III están disponibles de forma gratuita en línea en <https://cases.primeclerk.com/puertorico>.
- Si tiene preguntas, comuníquese con Prime Clerk al (844) 822-9231 (número gratuito para EE.UU. y Puerto Rico) o al (646) 486-7944 (para llamadas internacionales), disponible de 10:00 a.m. a 7:00 p.m. (Hora Estándar del Atlántico) (Disponible en español).

SI USTED NO RESPONDE DE CONFORMIDAD CON ESTA NOTIFICACIÓN, EL TRIBUNAL PODRÍA OTORGAR EL REMEDIO SOLICITADO POR LA OBJECIÓN COLECTIVA SIN MEDIAR NOTIFICACIÓN O AUDIENCIA POSTERIOR.

² Los términos en mayúscula no definidos en el presente tendrán los significados que se les atribuye en la Objeción Colectiva.

AVISO IMPORTANTE CONFORME A LA REGLA LOCAL 3007-1

Toda parte a quien se haya notificado esta Objeción Colectiva, o alguna otra parte de esta acción que cuestione la reparación aquí pretendida, debe notificar y presentar una respuesta a la Objeción Colectiva en la oficina del Secretario del Tribunal de Distrito de Estados Unidos para el Distrito de Puerto Rico antes de las **4:00 pm (Hora Estándar del Atlántico)** del **[Fecha]** a menos que el plazo sea prorrogado, por escrito, por **[Deudor]**. Si no se presenta la respuesta dentro del plazo aquí establecido, la Objeción Colectiva se considerará sin oposición y podrá ser otorgada a menos que: (1) la reparación solicitada estuviere prohibida por ley; (2) la reparación solicitada fuere contraria a la política pública, o (3) a juicio del Tribunal, se debiere actuar de otra forma en aras de la justicia. Si presenta una respuesta en tiempo y forma, el Tribunal podrá programar una audiencia.

Información fundamental para los Demandantes que opten por presentar una Respuesta

Quiénes están obligados a presentar una Respuesta. Cualquier parte que se oponga a la Objeción Colectiva deberá presentar una respuesta de conformidad con los procedimientos aquí establecidos. Si una parte cuya reclamación estuviere sujeta a la Objeción Colectiva no presenta ni notifica una respuesta en cumplimiento de los procedimientos descritos en el presente, el Tribunal podrá hacer lugar a la Objeción Colectiva con respecto a dicha reclamación, sin necesidad de cursar una notificación ulterior al demandante.

Quiénes NO están obligados a presentar una respuesta. Si usted no se opone a la desestimación total o parcial de su(s) reclamación(es) que se figuran en la lista del Anexo A a la Objeción Colectiva, entonces usted no necesita presentar una respuesta por escrito a la Objeción Colectiva y no es necesario que comparezca a la audiencia en que se tratará la Objeción Colectiva (que se describe a continuación). Además, la Objeción Colectiva solo se aplica a las reclamaciones que figuran en el Anexo A a la Objeción Colectiva, cuya copia puede consultarse de manera gratuita en línea, en <https://cases.primeclerk.com/puertorico>. No se requiere ninguna respuesta si su reclamación no aparece en la lista del Anexo A a la Objeción Colectiva.

Fecha límite para presentar una Respuesta. Su respuesta se considerará oportuna **solo si** es presentada ante el Tribunal **y** notificada antes de las **4:00 pm (Hora Estándar del Atlántico)** del **[Fecha]**, a menos que el plazo sea prorrogado, por escrito, por **[Deudor]** o cuando medie una solicitud por escrito ante el Tribunal y una resolución del Tribunal que prorroga la fecha límite.

La fecha límite para presentar y notificar una respuesta es las 4:00 pm (Hora estándezar del Atlántico) del [Deudor].

Audiencia sobre la Objeción Colectiva. La respuesta correctamente presentada y notificada de acuerdo con este aviso dará lugar a la realización de una audiencia sobre la Objeción Colectiva y la respuesta a las **9:30 a.m. (Hora estándezar del Atlántico)** del **[Fecha]**, ante la Honorable Jueza Laura Taylor Swain en el Tribunal de Distrito de Estados Unidos para el

Distrito de Puerto Rico, ubicado en 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767. Si usted presenta una respuesta a la Objeción Colectiva, deberá entonces prepararse para comparecer en la audiencia sobre la Objeción Colectiva. [Deudor], sin embargo, se reserva el derecho, con tres (3) días hábiles de antelación, de postergar la audiencia en la que se trate la Objeción Colectiva y la respuesta.

Los Deudores podrán presentar una contestación a su respuesta o responder mediante un alegato oral en la audiencia. Los Deudores podrán presentar su respuesta a más tardar siete (7) días calendario antes de la audiencia sobre la Objeción Colectiva y la respuesta.

EL TRIBUNAL SOLO TOMARÁ EN CONSIDERACIÓN SU RESPUESTA SI ESTA PRESENTADA Y NOTIFICADA ANTES O EN LA FECHA LÍMITE PARA PRESENTAR RESPUESTAS, DE CONFORMIDAD CON LAS INSTRUCCIONES INDICADAS EN ESTE AVISO.

Qué debe presentarse junto con una Respuesta. La respuesta a la Objeción Colectiva debe contener la siguiente información.

- (v) **Información de Contacto.** La respuesta debe incluir un **nombre, dirección, número de teléfono, y dirección de correo electrónico** del (1) reclamante que responde; (2) el abogado o representante designado del reclamante a quien los abogados de [Deudor] deben notificar una réplica a la respuesta, si la hubiere; o (3) la parte con facultades para conciliar, liquidar o de otro modo resolver la Objeción Colectiva en representación del reclamante.
- (vi) **Título.** La respuesta debe contener un título que indique el nombre del Tribunal, los nombres de los Deudores, el número de caso, el título de la Objeción Colectiva a la cual está dirigida la respuesta y el o los números de evidencias de reclamaciones relacionadas otorgados por Prime Clerk (que figuran en el Anexo A a la Objeción Colectiva y que están disponibles de forma gratuita en línea, en <https://cases.primeclerk.com/puertorico>).
- (vii) **La o las razones para oponerse a la Objeción Colectiva.** La respuesta debe contener una declaración concisa que indique las razones por las cuales el Tribunal no debería hacer lugar a la Objeción Colectiva con respecto a su Reclamación, incluidos los fundamentos fácticos y jurídicos que esgrimirá el demandante para oponerse a la Objeción Colectiva.
- (viii) **Documentación de Respaldo.** En la medida en que no se haya incluido ya en la evidencia de la reclamación, la respuesta debe incluir una copia de cualquier otra documentación o evidencia, con base en la cual el reclamante habrá de fundamentar su oposición a la Objeción Colectiva; con la salvedad, sin embargo, de que el reclamante no estará obligado a revelar en la respuesta información confidencial, propia o de otro modo protegida; y con la salvedad, asimismo, de que el reclamante deberá revelar al Deudor toda la información y proporcionarle copias de todos los documentos que el reclamante considere confidenciales, propios o de otro modo protegidos, y en los cuales este tenga intención de basarse para fundamentar su reclamación, con sujeción a las limitaciones de confidencialidad que sean

pertinentes.

Dónde y cómo presentar y notificar una Respuesta. Todas las respuestas deben presentarse de manera electrónica al Tribunal en el expediente *en el cual figure: Estado Libre Asociado de Puerto Rico*, No. de Caso 17 BK 3283-LTS. Existen dos métodos que usted puede emplear para presentar su respuesta:

3. **En línea.** Los usuarios registrados del sistema de archivo de casos del Tribunal deben presentar su respuesta de forma electrónica en formato PDF con opción de búsqueda.
4. **Por correo postal.** Si usted no es un abogado que sea usuario registrado del sistema de archivo de casos del Tribunal, puede presentar y notificar una respuesta mediante correo postal a la oficina del Secretario del Tribunal, el Comité de Supervisión y el Comité de Acreedores, a los siguientes domicilios:

Oficina del Secretario
Tribunal de Distrito de los Estados Unidos
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Abogado la Junta de Supervisión
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036-8299
Atención: Martin J. Bienenstock
Brian Rosen

Abogado del Comité de Acreedores
Paul Hastings LLP
200 Park Avenue
New York, New York 10166
Atención: Luc A. Despins
James Bliss
James Worthington
G. Alexander Bongartz

SU RESPUESTA debe ser enviada por correo postal para ser recibida en la oficina del Secretario, la Junta de Supervisión y el Comité de Acreedores a más tardar a las **4:00 p.m. (Hora Estándar del Atlántico)** del [Fecha], a menos que [Deudor] pospusiere esta fecha por escrito, o ante la solicitud escrita dirigida al Tribunal y la resolución de este que pospone la fecha límite.

Si usted no pudiere presentar y notificar una respuesta en línea o por correo postal como se indicó arriba, puede presentar la respuesta en persona en el domicilio que se indica a continuación, a más tardar a las **4:00 p.m. (Hora Estándar del Atlántico)** del [Fecha], a menos que [Deudor] pospusiere esta fecha por escrito, o ante la solicitud escrita dirigida al Tribunal y la resolución de este que pospone la fecha límite.

Oficina del Secretario
Tribunal de Distrito de los Estados Unidos
#150 Chardon Avenue
Federal Building
San Juan, Puerto Rico 00918

Su respuesta debe incluir un certificado de entrega que explique cómo se efectuó la notificación.

Si tiene cualquier pregunta sobre cómo presentar y notificar una respuesta, incluso preguntas sobre el sistema de archivo de casos del Tribunal, póngase en contacto con **la línea de ayuda de Prime Clerk** al **(844) 822-9231**.

Reserva de Derechos. NINGUNA PARTE DE ESTA OBJECIÓN COLECTIVA O NOTIFICACIÓN CONSTITUYE O HABRÁ DE INTERPRETARSE COMO UNA RENUNCIA A NINGUNO DE LOS DERECHOS DE [DEUDOR], O DE CUALQUIER OTRA PARTE INTERESADA EN ESTOS CASOS AL AMPARO DEL TÍTULO III, DE DISPUTAR RECLAMACIONES, FORMULAR RECONVENCIONES, RECLAMAR DERECHOS DE COMPENSACIÓN O REEMBOLSO, PRESENTAR DEFENSAS, OBJETAR RECLAMACIONES (U OTRAS RECLAMACIONES O CUESTIONES DE FONDO DE UN RECLAMANTE) CON CUALQUIER FUNDAMENTO NO EXPUESTO PREVIAMENTE EN UNA OBJECIÓN, A MENOS QUE EL TRIBUNAL HAYA DESESTIMADO LA RECLAMACIÓN O RESUELTO DE OTRA FORMA, O A SOLICITAR LA ESTIMACIÓN DE CUALQUIER RECLAMACIÓN EN UNA FECHA POSTERIOR. LAS PARTES AFECTADAS SERÁN DEBIDAMENTE NOTIFICADAS DE ELLO EN ESE MOMENTO.

Recursos Adicionales y a Quién Contactar para formular Preguntas

Todos los documentos presentados en los Casos iniciados al amparo del Título III, incluidas copias de las reclamaciones presentadas utilizando CM/ECF, se encuentran disponibles de forma gratuita en línea, en <https://cases.primeclerk.com/puertorico>. Este sitio web es mantenido por Prime Clerk y contiene una base de datos apta para búsquedas para ayudar a localizar documentos.

Si necesita obtener información adicional sobre la Objeción Colectiva, el estado de su respuesta, su reclamación o este aviso, póngase en contacto con la línea de ayuda de Prime Clerk llamando al **(844) 822-9231** (sin cargo para EE.UU. y Puerto Rico), o al **(646) 486-7944** (para llamadas internacionales), disponible desde las 10:00 a.m. hasta las 7:00 p.m. (Hora Estándar del Atlántico) (Disponible en español). Las consultas también pueden enviarse por correo electrónico a puertoricoinfo@primeclerk.com.

Exhibit B

Redline of Initial and Amended Omnibus Procedures

I. AMENDED OMNIBUS OBJECTION PROCEDURES

1. Grounds for Omnibus Objections. ~~The Debtors may file omnibus objections (each an “Omnibus Objection”) to claims on the grounds expressly set forth in Bankruptcy Rule 3007(d)(1) – (7).~~ The Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Puerto Rico Electric Power Authority (“PREPA,” and together with the Commonwealth, COFINA, ERS, and HTA, the “Debtors,” and each individually, a “Debtor”),¹ may file omnibus objections (each an “Omnibus Objection”) to proofs of claim filed against one or more Debtors (each a “Claim,” and collectively the “Claims”), on the grounds expressly set forth in Rule 3007(d)(1)-(7) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), as well as on the following additional grounds (the “Additional Grounds”):

- a. Claims are inconsistent with the Debtors’ books and records, and Omnibus Objections filed on this Additional Ground shall include the amount, if any, of each Claim as reflected in the applicable Debtor’s books and records;
- b. Claims fail to specify the asserted amount for each Claim, or for each Claim only list the amount as “unliquidated,” “undetermined,” or “unknown,” and which Debtors contend should be liquidated at a particular amount, and Omnibus Objections filed on this Additional Ground shall identify the claim amount, if any, that the Debtor believes in good faith should be allowed;
- c. Claims seek recovery of amounts for which the Debtors are not liable, and Omnibus Objections filed on this Additional Ground shall identify the legal basis for the contention that the Debtor is not liable for the Claim;
- d. Claims are incorrectly and/or improperly classified; or
- e. Claims are filed against non-Debtors.

2. Form of Omnibus Objection. Each Omnibus Objection will be numbered consecutively, regardless of basis, and will be ~~provided~~ filed and served in both Spanish and English. Each Omnibus Objection will denote whether it is based on a substantive or non-substantive basis or bases.

3. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. ~~Each exhibit (each a “Claims Exhibit”). Each Claims Exhibit will include only the Claims to which there is a common basis or bases for the Omnibus Objection. Claims for which there is more than one basis for the Omnibus Objection~~

¹ ~~For purposes of this Motion only, and because COFINA has already reconciled substantially all of their proofs of claim, COFINA is not included among the Debtors.~~

~~will be referenced on each exhibit applicable thereto. The exhibits Each Claims Exhibit~~ will include, without limitation, the following information, alphabetized by claimant:

- ~~a.a.~~ the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;
- ~~b.b.~~ the asserted amount of the Claim(s);
- ~~c.c.~~ the grounds for the Omnibus Objection; and
- ~~d.d.~~ other information, as applicable, including: (i) the proposed classification of Claims the Debtors seek to reclassify; (ii) the proposed Claim amount of Claims the Debtors seek to reduce; or (iii) the surviving Claims, if any, of groups of Claims the Debtors seek to expunge.

~~To the extent an Omnibus Objection seeks to reduce a claim or to liquidate an otherwise unliquidated claim, the claims exhibit shall include the proposed adjusted claim amount. Each omnibus objection will also be accompanied by a proposed order which shall provide a clear reference to the Claims Exhibit accompanying the objection. To the extent a Claims Exhibit is revised and resubmitted to the Court, the Debtors will provide the Court with revised proposed orders that attach the revised Claims Exhibits as attachments to the revised proposed order.~~

4. Notice and Service. Each Omnibus Objection will be filed with the Court ~~on the docket of In re Commonwealth of Puerto Rico, Case No. 17 BK 3283-LTS~~, and served upon (a) any individual creditors subject to such Omnibus Objection, (b) the U.S. Trustee, and (c) the Master Service List (as defined by the *Order Further Amending Case Management Procedures* [Case No. 17-3283, ECF No. ~~38044806~~]), which is available on the Debtors' case website at ~~https://cases.primeclerk.com/puertorico.5.Local Rule 3007-1 Notice. Pursuant to Puerto Rico Local Bankruptcy Rule 3007-1, https://cases.primeclerk.com/puertorico. The form of notice to accompany each Omnibus Objection will include the following notice in a conspicuous location shall be approved by the Court.~~

~~IMPORTANT NOTICE PURSUANT TO LOCAL RULE 3007-1~~

~~Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States District Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the court may schedule a hearing.~~

5. 6.Omnibus Hearings~~Hearing~~. Each Omnibus Objection shall be set for ~~a~~ hearing at the next omnibus hearing set by the Court, but in no event less than forty-five (45) days after service of the Omnibus Objection (the "Hearing"). In the Debtors' sole discretion, and, upon three (3) business days' prior notice to an individual creditor subject to an Omnibus Objection, the Debtors may adjourn the Hearing on the Omnibus Objection to a subsequent hearing date without further order of the Court. For claims subject to an Omnibus Objection and with respect

to which no response is filed in accordance with the proposed response procedures (a “Response”), the Court may grant the Omnibus Objection with respect to those claims without further notice or hearing. For claims subject to an Omnibus Objection for which a Response is filed in accordance with the proposed response procedures, and for which the issues raised in the Response are resolved prior to the Hearing, the Debtors may request at the Hearing that the Court enter an order granting the Omnibus Objection with respect to such claim(s). If such claim(s) cannot be resolved and a hearing is determined to be necessary, the Debtors shall file with the Court and serve on the affected claimant(s) a notice of the hearing, to the extent the Debtors did not file a notice of hearing previously.

6. 7.Contested Matter. Each claim subject to an Omnibus Objection, along with any ~~Responses~~Response thereto, shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court with respect to an Omnibus Objection will be deemed a separate order with respect to such claim. The Debtors may, in their discretion and in accordance with other orders of this Court ~~or and~~ the provisions of the Bankruptcy Code and the Bankruptcy Rules, settle the priority, amount, and validity of such contested claims without any further action, order, or approval of the Court. However, at least ten (10) business days prior to settling any claim, the Debtors shall contact counsel for the Creditors’ Committee (in the manner and as defined by the *Order Further Amending Case Management Procedures* [Case No. 17- 3283, ECF No. 38044806]), which is available on the Debtors’ case website at <https://cases.primeclerk.com/puertorico>, to advise them of the Debtors’ intent to settle the claim (“Claim Settlement Notice”). The Claim Settlement Notice shall include ~~the~~ (i) the claim number, (ii) the amount of the claim, (iii) a brief description of the intended settlement of the claim. If the Creditors’ Committee does not inform Debtors of any objections to the Claim Settlement Notice within five (5) business days of service, or if any such objections are resolved by negotiations between the Debtors and the Creditors’ Committee, then the Debtors may proceed in accordance with other orders of this Court ~~or and~~ the provisions of the Bankruptcy Code and the Bankruptcy Rules, to settle the priority, amount, and validity of the contested claims as described in its Claim Settlement Notice, as modified by the parties’ negotiations.

II. RESPONSES TO OMNIBUS OBJECTIONS

7. 8.Parties Required to File a Response. Any party who disputes an Omnibus Objection is required to file a Response in accordance with the procedures set forth herein. If a party whose claim is subject to an Omnibus Objection does not file and serve a Response in compliance with the procedures below, the Court may grant the Omnibus Objection with respect to such claim without further notice to the claimant.

8. 9.Response Contents. Each Response must contain the following (at a minimum):

- a. a caption stating the name of the Court, the name of the Debtors, the case number, the title of the Omnibus Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Prime Clerk (~~which will be scheduled with the Omnibus Objection and is available on the Debtors’ case website at~~website, <https://cases.primeclerk.com/puertorico>);

- b. a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to such claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection;
- c. a copy of any other documentation or other evidence of the claim, to the extent not already included with the Proof of Claim, upon which the claimant will rely in opposing the Omnibus Objection; provided, however, that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; provided, further, that the claimant shall disclose to the Debtors all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints; and
- d. the following contact information for the responding party:
 - (i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the attorneys for the Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the claimant's behalf.

9. 10.Filing and Service of the Response. A Response will be deemed timely only if it is filed with the Court and served by 4:00 pm (Atlantic Time) on the ~~day that is 30~~deadline for filing a Response set forth in the notice accompanying the Omnibus Objection (the “Response Deadline”), which in no event shall be less than thirty (30) calendar days from the date the Omnibus Objection is served (or an additional three (3) days pursuant to ~~Fed. R. Bank. P. Bankruptcy Rule~~ 9006(f) if service was by mail), ~~unless otherwise extended, in writing, by the Debtors (the “Response Deadline”). A Response must be served on the Oversight Board. Each Response should be filed electronically with the Court on the docket of In re Commonwealth of Puerto Rico, Case No. 17 BK 3283-LTS. A Response should be filed electronically in searchable portable document format by a registered user of the Court’s case filing system, except if a party is not an attorney who is a registered user of the Court’s case filing system, the Response may be filed and served by mailing it to the Court’s Clerk’s office, the Oversight Board, and the Creditors’ Committee (in the manner and as defined by the Order Further Amending Case Management Procedures [Case No. 17-3283, ECF No. 3804]), which is available on the Debtors’ case website at https://cases.primeclerk.com/puertorico.11.Discovery. As all initial Omnibus Objections will be made on non substantive bases, no discovery will be permitted in relation to any Omnibus Objection at the following addresses:~~

Clerk's Office
United States District Court
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Counsel for the Oversight Board
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036-8299
Attn: Martin J. Bienenstock
Brian S. Rosen

Counsel for the Creditors' Committee
Paul Hastings LLP
200 Park Avenue
New York, New York 10166
Attn: Luc. A. Despins
G. Alexander Bongartz

Any Response must be mailed so as to be received by the Clerk's Office, the Oversight Board, and the Creditors' Committee no later than 4:00 pm (Atlantic Standard Time) on the Response Deadline, unless otherwise extended by the Debtors, in writing, or upon a written request to the Court and order of the Court extending the deadline. If a party is unable to file and serve a Response online or by mail as specified above, a Response may be filed in person at the following address by no later than 4:00 pm (Atlantic Standard Time) on the Response Deadline, unless otherwise extended by the Debtors, in writing, or upon a written request to the Court and order of the Court extending the deadline:

Clerk's Office
United States District Court
#150 Chardon Avenue
Federal Building
San Juan, Puerto Rico 00918

Each Response must include a certificate of service explaining how service was accomplished.

10. 12. Failure to Respond. A Response that is not filed and served by the Response Deadline, or such other date as agreed with the Debtors, in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent reaching an agreement with the Debtors resolving the Omnibus Objection to a Claim, failure to timely file and serve a Response as set forth herein may result in the Court granting the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

11. 13. Reply to a Response. The Debtors shall be permitted to file a reply to any Response on the docket of In re Commonwealth of Puerto Rico, Case No. 17 BK 3283-LTS no later than seven (7) calendar days before the Hearing with respect to the relevant Omnibus

Objection. Contemporaneously with their reply in support of any Omnibus Objection, the Debtors shall file a revised proposed order, which shall attach a revised Claims Exhibit detailing the status of each claim that is subject to such omnibus objection, including docket references for withdrawals of responses. To the extent the status of any claim changes, revised proposed orders, which shall attach revised Claims Exhibits, must be filed by 9:00am (AST) on the day before the omnibus hearing.

III MISCELLANEOUS

12. 14.Additional Information. Copies of these procedures, the Order, or any other pleadings filed in the Debtors' ~~PROMESA~~Title III cases are available free online at <https://cases.primeclerk.com/puertorico>.

13. 15.Inquiries. Creditors ~~may~~should direct questions regarding the status of a particular ~~omnibus objections~~Omnibus Objection to Prime Clerk at (844) 822-9231.

14. 16.Reservation of Rights. NOTHING IN THESE PROCEDURES, ANY OMNIBUS OBJECTION, OR ANY OBJECTION NOTICE IS OR SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF THE DEBTORS OR ANY OTHER PARTY IN INTEREST IN THESE CASES TO DISPUTE ANY CLAIMS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE NOTICE THEREOF AT SUCH TIME.